

EXHIBIT 46

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

JAMES D. SULLIVAN, et)
al, individually, and)
on behalf of a Class of)
persons similarly)
situated,) Civil Action No.
5:16-cv-00125
Plaintiffs,)
vs.)
SAINT-GOBAIN)
PERFORMANCE PLASTICS)
CORPORATION,)
Defendant.)

VIDEOTAPED DEPOSITION OF LINDA CRAWFORD,
taken pursuant to notice before Beth Gaige,
Registered Professional Reporter, at the
offices of BarrSternberg Moss Silver & Munson,
P.C. 507 Main Street, Bennington, Vermont, on
April 25, 2018, commencing at 9:25 a.m.

A P P E A R A N C E S

FOR THE PLAINTIFFS,

EMILY J. JOSELSON, ESQ.
Langrock Sperry & Wool, L.L.P.
P.O. Drawer 351
Middlebury, VT 05753
Phone: 802.388.6356
E-mail: Ejoselson@langrock.com

DAVID F. SILVER, ESQ.
Barr Sternberg Moss Silver & Munson, P.C.
507 Main Street
Bennington, VT 05201
Phone: 802.442.6341
E-mail: Dsilver@barrsternberg.com

FOR THE DEFENDANT:

NATHAN WILLIAMS, ESQ.
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue
New York, NY 10010
Phone: 212.849.7000
E-mail: Nathanwilliams@quinnemanuel.com

PAUL A. LAFATA, ESQ.
Quinn Emanuel Urquhart & Sullivan LLP
51 Madison Avenue
New York, NY 10010
Phone: 212.849.7000
E-mail: PaulLaFata@quinnemanuel.com

INDEX

WITNESS: LINDA CRAWFORD

Direct Examination by Mr. LaFata	7
Cross-Examination by Ms. Joselson	213
Redirect Examination by Mr. LaFata	216

E X H I B I T S

Exhibit No.	Exhibit Description	Page
Exhibit 1	Notice of Deposition	9
Exhibit 2	Incident report	29
Exhibit 3	Incident Report	33
Exhibit 4	Medical record from Village Primary Care	54
Exhibit 5	Southwestern Vermont Medical Center ultrasound report	60
Exhibit 6	Result Letter from Dr. Carroll	62
Exhibit 7	Twin Rivers Medical, P.C. - April 22, 2017, letter	64
Exhibit 8	July 21, 2016, letter from Vermont Department of Health	85
Exhibit 9	Analytical Results for PFOA	89
Exhibit 10	October 10, 2016, letter from the State of Vermont	91
Exhibit 11	June 21, 2017 letter from the State of Vermont	92

1	Exhibit 12	Photographs of home	125
2	Exhibit 13	Declaration	143
3	Exhibit 14	Uniform residential appraisal report	151
4			
5	Exhibit 15	Appraisal of Real Property	154
6			
7	Exhibit 16	Town of Bennington - Notice to Taxpayers as of 6/5/2008	159
8	Exhibit 17	Town of Bennington Tax Bill	160
9	Exhibit 18	Sleep study order form	173
10	Exhibit 19	Twin Rivers Medical colonoscopy report	174
11			
12	Exhibit 20	War of words, with teeth article	202
13			
14	Exhibit 21	Burlington Free Press article	203
15			
16	Exhibit 22	May 2, 2001, It's emotion, not science article text	206
17			
18			
19			
20			
21			
22			
23			
24			
25			

STIPULATION

(It is hereby agreed by and between the parties that signature is not waived.)

- - - - -

THE VIDEOGRAPHER: Good morning. We are now going on the record at 9:25 a.m. Today's date is April 25, 2018. Please note that microphones are sensitive and may pick up whispering and private conversations and cellular interference. Please turn off or keep phones muted and away from microphones as they are known to interfere with deposition audio once in a while, and audio-video recording will continue to take place unless all parties agree to go off the record.

This is media unit number one of the video-recorded deposition of Linda Crawford taken by counsel for defendants in the matter of James D. Sullivan, et al, individually and on behalf of persons similarly situated as plaintiffs, versus Saint-Gobain Performance Plastics Corporation, defendants. The matter is being filed in the United States District Court, District of Vermont, and our deposition today is being held at the offices of

1 BarrSternberg Moss Silver & Munsom, P.C. We
2 are located at 507 Main Street, Bennington,
3 Vermont, 05201.

4 My name is Mati Kiin, certified legal
5 video specialist, representing the firm of
6 Veritext, New York, and I am the videographer.
7 Our court reporter is Beth Gaige, who is also
8 representing Veritext.

9 I am not authorized to administer an
10 oath, nor am I related to any party in this
11 action, nor am I financially interested in the
12 outcome.

13 Counsel and all present in the room will
14 now state their appearances and affiliations
15 for the record, and if there are any
16 objections to the proceeding please state them
17 at the time of your appearance. And now
18 beginning with the noticing attorney.

19 MR. LAFATA: Good morning. My name is
20 Paul LaFata. I'm from Quinn Emanuel and
21 represent Saint-Gobain.

22 (Off-the-record colloquy.)

23 MR. WILLIAMS: Nathan Williams of Quinn
24 Emanuel for defendant.

25 MR. SILVER: David F. Silver for the

1 plaintiff.

2 MS. JOSELSON: Emily Joselson for the
3 plaintiffs.

4 THE VIDEOGRAPHER: Thank you. I will now
5 ask our notary to swear in the witness.

6 (The Witness was administered the oath.)
7 LINDA CRAWFORD, having been duly sworn by the
8 Notary Public, was examined and testified as
9 follows:

10 DIRECT EXAMINATION

11 BY MR. LAFATA:

12 Q. Would you please state your full name for the
13 record?

14 A. Linda Crawford.

15 Q. And have you previously gone by any other
16 name?

17 A. Yes.

18 Q. What are those?

19 A. Linda Waite and Linda Herrick.

20 Q. Would you spell Waite?

21 A. W-a-i-t-e.

22 Q. Would you please spell Herrick?

23 A. H-e-r-r-i-c-k.

24 Q. Thank you very much.

25 And what is your date of birth?

1 A. 9/19/1947.

2 Q. And have you ever been deposed before or given
3 testimony before?

4 A. No.

5 Q. This is your first time?

6 A. Yes.

7 Q. All right. Well, I will be asking some
8 questions during the deposition, and you will
9 be providing the answers. You probably heard
10 that Beth Gaige, the court reporter, will be
11 typing down what we say.

12 A. Yes.

13 Q. You understand that?

14 A. Yes.

15 Q. And because there is going to be a record on
16 paper, we have to say our answers out loud.
17 So if you nod or shake your head, it won't be
18 on the record. So just make sure you answer
19 the questions verbally, okay?

20 A. Yes.

21 Q. And if I say something that you don't
22 understand or a question that's not clear to
23 you, please let me know. All right?

24 A. Yes.

25 Q. If we need to take a break during the

1 A. I don't believe -- no, I don't believe I have
2 seen this.

3 BY MR. LAFATA:

4 Q. I am sorry. What was you answer?

5 A. No, I don't -- I have not seen this.

6 Q. That's fine. Now is the first time you have
7 seen it?

8 A. Yes.

9 Q. Okay. What, if anything, did you do to
10 prepare for today's deposition?

11 A. I read through the discovery documents that I
12 had provided to counsel. That's about it.

13 Q. Okay. When did you do that?

14 A. Oh, off and on for a couple weeks.

15 Q. All right. And do you recall what you looked
16 through?

17 A. Oh, I read the facts of the case. I read
18 about PFOA. I reviewed my house assessments.
19 I reviewed some of the repairs we have done to
20 the house.

21 Q. Thank you. Is that about it?

22 A. That's about it.

23 Q. Do you recall looking through, in preparation
24 for today's deposition, any prior deposition
25 testimony by anybody?

1 A. No.

2 Q. Do you prefer to go by Ms. Crawford or Mrs.
3 Crawford?

4 A. Mrs. Is fine.

5 Q. Okay, Mrs. Crawford.

6 Are you currently employed, Mrs.
7 Crawford?

8 A. No.

9 Q. When were you last employed?

10 A. 2010.

11 Q. Where did you work in 2010?

12 A. The Vermont Veterans' Home in Bennington.

13 Q. What was your job there?

14 A. I worked in the social service department and
15 I was the admissions coordinator for much of
16 that time.

17 Q. What were your responsibilities as the
18 admissions coordinator?

19 A. Somebody would make an inquiry or an
20 application to either be admitted to the vet's
21 home or have a family member admitted to the
22 vet's home. My job was to assess their
23 medical condition. If we could meet the needs
24 of that person, if that person had something
25 that required isolation, things like that, to

1 make sure they fit in well and we could
2 provide for their needs.

3 Q. What do you mean by isolation?

4 A. Well, if they had something contagious.

5 Q. Like the flu or?

6 A. Yeah, like the flu or even, you know,
7 shingles. Something like that.

8 Q. Okay. When you assess the medical condition
9 of people who speak to you, do you do that
10 over the telephone or in person or how do you
11 do that?

12 A. Usually it starts by a phone call; then I go
13 meet the person, be it at home or in a
14 hospital; then I collect the appropriate data,
15 lab work, things like that.

16 Q. About how often would you meet someone in the
17 hospital for this purpose?

18 A. Four times a month.

19 Q. Would they ever come in to see you?

20 A. Oh, yes. Yes.

21 Q. And what were some of the medical reports you
22 would look through for a patient like this?
23 What are some examples?

24 A. Their history, their current illness, lab
25 work, x-rays, physicians' notes.

1 Q. And would you make a decision whether to admit
2 them or not based on this information?

3 A. No. It was more complicated. We had an
4 admissions committee; that I had to present
5 this case to other members of the staff, and
6 we would all vote to see if we could meet
7 their needs.

8 Q. How many people are cared for in this facility
9 during this time?

10 A. Oh, wow. I don't recall.

11 Q. How many people are on the admissions
12 committee?

13 A. Five.

14 Q. And what were there -- what were the -- let me
15 rephrase this.

16 What sort of people were on the
17 admissions committee, like physicians or
18 nurses, anything like that?

19 A. The director of nursing, another RN, a
20 dietitian, physical therapist, and myself.

21 Q. Was this an inpatient facility?

22 A. Yes.

23 Q. And when did you start working at the Vermont
24 Veterans' home?

25 A. 1987.

1 Q. Did you work there continuously from 1987 to
2 2010?

3 A. I did.

4 Q. Why did you retire in 2010?

5 A. Burnt out. Tired.

6 Q. Do you feel better now?

7 A. Much.

8 Q. Did you have any other job responsibilities
9 during that period aside from being the
10 admissions person?

11 A. Yes. I offered one-on-one counseling. We had
12 a policy to always sit with someone who was
13 passing away if they had no family, so I would
14 participate in that.

15 I helped people do Medicaid applications,
16 apply for VA benefits and respond to anything
17 going on, like if somebody was in crisis.

18 Q. You mean a medical crisis?

19 A. No, more of an emotional crisis.

20 Q. What sort of counseling might you provide
21 during this period?

22 A. Well, our clientele is mostly elderly, and
23 sometimes we would have the elderly sick
24 person but their spouse would pass way. I'll
25 just do the basic support, sit and talk to

1 them, things like that.

2 Q. During this period, did you ever prescribe
3 medications?

4 A. No.

5 Q. Were you ever licensed to prescribe
6 medications?

7 A. No.

8 Q. Did you ever administer medication?

9 A. Yes, not as a social worker but as an RN
10 previously.

11 Q. Did you ever administer intravenous
12 medications?

13 A. Yes.

14 Q. Oral medications?

15 A. Yes, but not at the vet's home, at my previous
16 job.

17 Q. At the vet's home, did you administer oral
18 medications?

19 A. No.

20 Q. Any other routes of administration during that
21 period did you administer medications?

22 A. No.

23 Q. Did you take blood during your work at this
24 facility?

25 A. No.

1 Q. Did you perform any x-rays?

2 A. No.

3 Q. Any radiology testing?

4 A. No.

5 Q. During your work at Vermont Veterans' Home,
6 did you do any laboratory work?

7 A. No.

8 Q. Where you did you work before the Vermont
9 Veterans' Home?

10 A. Southwestern Vermont Medical Center.

11 Q. When you did start at the Southwestern Vermont
12 Medical Center?

13 A. 1977.

14 Q. And when did you leave that facility?

15 A. 1986.

16 Q. You then went from the Southwest [sic] Vermont
17 Medical Center to the Vermont Veterans' Home?

18 A. Not immediately, but yes.

19 Q. What did you do between those periods?

20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]

24 Q. What was your job at the Southwest Vermont
25 Medical Center?

1 A. I was a registered nurse.

2 Q. And what was your responsibility -- your job
3 responsibilities at the Southwest Vermont
4 Medical Center?

5 A. Whatever was assigned. Some days I gave
6 medications. Some days I did bedside nursing.

7 Q. What is bedside nursing?

8 A. We did everything. We did bed baths. I made
9 the bed, got them up for exercise, fed them,
10 if needed, made sure they ate if they could
11 feed themselves. I would just generally be
12 there for them, respond to their needs.

13 Q. Did you administer prescription medication as
14 a nurse at this facility?

15 A. Yes.

16 Q. What were the routes of administration that
17 you administered the medication?

18 A. Oral, IM, subq, IV, per tube, per g-i tube.

19 Q. What is IM?

20 A. Intramuscular, a shot.

21 Q. Mm-hmm. Did you prescribe any medications
22 during your work at this facility?

23 A. No.

24 Q. Did you administer any radiology testing
25 during your work at this facility?

1 A. No.

2 Q. Any x-ray testing?

3 A. No.

4 Q. Did you perform any lab work during your work
5 at this facility?

6 A. No.

7 Q. Have you ever performed lab work?

8 A. No.

9 Q. That's easier.

10 Why did you leave the Southwest Vermont
11 Medical Center in 1986?

12 [REDACTED]
13 [REDACTED]
14 [REDACTED]

15 Q. Did you get care for your back?

16 A. Yes.

17 Q. What sort of care did you get?

18 A. Physical therapy.

19 Q. Did that help your back?

20 A. With time, yes.

21 Q. Where did you work before the Southwest
22 Vermont Medical Center?

23 A. I worked at a hospital. It's now closed.
24 Mary McClellan Hospital in Cambridge, New
25 York.

1 Q. Would you please repeat the name?

2 A. Mary McClellan. But I worked there very
3 briefly.

4 Q. When did you work there?

5 A. 70 -- 75. No, '74 to '75.

6 Q. What were your responsibilities at -- is this
7 a hospital?

8 A. Mm-hmm.

9 Q. And what was your responsibilities at this
10 hospital?

11 A. Medication nurse.

12 Q. What would -- what would that entail?

13 A. Giving ordered medications.

14 Q. Would you sometimes, when giving medications
15 at any of these facilities, need to consult
16 the Physicians Desk Reference?

17 A. Occasionally.

18 Q. Do you currently have an active nursing
19 license?

20 A. No.

21 Q. When did that become inactive?

22 A. 2012.

23 Q. When did you obtain your nursing license?

24 A. 1974.

25 Q. Was there a period of time between when you

■ ■ ■

2 Q. Where did you work before the Mary McClellan
3 Hospital in New York?

4 A. I did not work.

5 Q. This was your first professional job?

6 A. Mm-hmm.

7 Q. Is that a yes?

8 A. Yes.

9 Q. That's all right.

10 Other than your nursing license, have you
11 ever held any other licenses for work?

12 A. No.

13 Q. In any of these positions, have you ever filed
14 any claim for workers' compensation?

15 A. Yes.

16 Q. What was the first one you recall filings?

■ ■ [REDACTED]

■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ ■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED] ■

[illegible]

[illegible]

	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED]
	[REDACTED] [REDACTED] [REDACTED]
	[REDACTED]
	[REDACTED]

1	1	1
2	1	2
3		3
4	1	4
5		5
6	1	6
7		7
8	1	8
9	1	9
10	1	10
11	1	11
12	1	12
13	1	13
14	1	14
15	1	15
16	1	16
17	1	17
18	1	18
19	1	19
20	1	20
21	1	21
22	1	22
23	1	23
24	1	24
25	1	25
26	1	26
27	1	27
28	1	28
29	1	29
30	1	30
31	1	31
32	1	32
33	1	33
34	1	34
35	1	35
36	1	36
37	1	37
38	1	38
39	1	39
40	1	40
41	1	41
42	1	42
43	1	43
44	1	44
45	1	45
46	1	46
47	1	47
48	1	48
49	1	49
50	1	50
51	1	51
52	1	52
53	1	53
54	1	54
55	1	55
56	1	56
57	1	57
58	1	58
59	1	59
60	1	60
61	1	61
62	1	62
63	1	63
64	1	64
65	1	65
66	1	66
67	1	67
68	1	68
69	1	69
70	1	70
71	1	71
72	1	72
73	1	73
74	1	74
75	1	75
76	1	76
77	1	77
78	1	78
79	1	79
80	1	80
81	1	81
82	1	82
83	1	83
84	1	84
85	1	85
86	1	86
87	1	87
88	1	88
89	1	89
90	1	90
91	1	91
92	1	92
93	1	93
94	1	94
95	1	95
96	1	96
97	1	97
98	1	98
99	1	99
100	1	100

[illegible]

[illegible]

[illegible]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

█ [REDACTED] [REDACTED]

█ [REDACTED]

6 (Deposition Exhibit No. 2 was marked for
7 identification.)

8 Q. Mrs. Crawford, you have a copy of Exhibit 2 in
9 front of you.

10 Do you see at the top it says incident
11 report?

12 A. Mm-hmm.

13 Q. Is this the type of incident report that you
14 referenced today?

15 A. Yes.

16 Q. Do you see toward the bottom there's a
17 signature?

18 A. The very bottom?

19 Q. Mm-hmm.

20 A. My signature, yes.

21 Q. That's your signature?

22 A. Yes.

23 Q. And this was dated May 18, 1990.

24 Do you see that?

25 A. I do.

1 Q. Did you fill this out or did someone fill it
2 out?

3 A. I filled it out.

4 Q. Okay. Would you please read your handwriting
5 on the description of the incident for the
6 record?

--	--	--

[illegible]

[illegible]

[REDACTED]

[illegible]

[illegible]

1 [REDACTED] [REDACTED]
2 [REDACTED]
3 (Deposition Exhibit No. 3 was marked for
4 identification.)

5 Q. Mrs. Crawford, you have a copy of Exhibit 3 in
6 front of you.

7 Do you see at the top it says incident
8 report?

9 A. Yes.

10 Q. Do you see at the bottom there's a signature?

11 A. Yes.

12 Q. Is that your signature?

13 A. Yes.

14 Q. Do you see it's dated December 19, 1991?

15 A. Yes.

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED]
21 [REDACTED]
22 [REDACTED]
23 [REDACTED]
24 [REDACTED]
25 [REDACTED]
26 [REDACTED]
27 [REDACTED]
28 [REDACTED]
29 [REDACTED]
30 [REDACTED]

[illegible]

█ [REDACTED] [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]
█ [REDACTED]

7 Q. Is this the first case in which you have been
8 involved in a lawsuit?

9 A. Define lawsuit.

10 Q. Suing somebody.

11 A. Myself and the other women that were affected
12 did seek counsel about harassment at work.

13 Q. Did you file a lawsuit against the state or
14 your employer for the harassment?

15 A. Well, yes. Yes.

16 Q. When did you do that?

17 A. I can't recall.

18 Q. What was the harassment that you were suing
19 for?

20 A. The perfume.

21 Q. What was the outcome of that lawsuit?

22 A. We reached a settlement -- a settlement from
23 the state, and the -- and a perfume policy
24 went into effect.

25 Q. Did the settlement result in paying you money

1 for the harassment claim?

2 A. Yes.

3 Q. And what was that?

4 MS. JOELSON: Objection. Relevance.
5 You can answer.

6 A. I don't recall a specific -- it wasn't a lot,
7 I know that.

8 BY MR. LAFATA:

9 Q. And there were other -- were they all women
10 who sued together?

11 A. Mm-hmm.

12 Q. Were those coworkers?

13 A. Yes.

14 Q. Did you give any testimony with that lawsuit?

15 A. No.

16 Q. Did you sit for a deposition like this with
17 that --

18 A. No. No.

19 Q. Other than the suit against the state for
20 harassment, have you ever been -- and in this
21 case -- have you been involved in another
22 lawsuit before?

23 A. No.

24 Q. Ms. Crawford, because of the nature of the
25 claims in this case, there are some questions

1 I want to ask about some medical information
2 that would not be the type of questions that
3 you might have around the dinner table. So
4 it's not to be nosey but it's really the
5 nature of the claims in this case.

6 Do you understand?

7 A. Yes.

8 MS. JOSELSON: I'm going to object to the
9 characterization of that, but you can answer
10 those questions that you can.

11 BY MR. LAFATA:

■ ■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED] [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED]

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	20
	Sub-category 1.3	5
	Sub-category 1.4	85
	Sub-category 1.5	40
	Sub-category 1.6	75
	Sub-category 1.7	30
	Sub-category 1.8	55
	Sub-category 1.9	15
	Sub-category 1.10	90
Category 2	Sub-category 2.1	60
	Sub-category 2.2	25
	Sub-category 2.3	100
	Sub-category 2.4	30
	Sub-category 2.5	45
	Sub-category 2.6	95
	Sub-category 2.7	40
	Sub-category 2.8	20
	Sub-category 2.9	80
	Sub-category 2.10	15
Category 3	Sub-category 3.1	90
	Sub-category 3.2	25
	Sub-category 3.3	100
	Sub-category 3.4	40
	Sub-category 3.5	20
	Sub-category 3.6	55
	Sub-category 3.7	15
	Sub-category 3.8	85
	Sub-category 3.9	30
	Sub-category 3.10	95
Category 4	Sub-category 4.1	70
	Sub-category 4.2	45
	Sub-category 4.3	20

Category	Sub-category	Value
Category 1	Sub-category 1.1	100
	Sub-category 1.2	90
	Sub-category 1.3	100
	Sub-category 1.4	40
	Sub-category 1.5	10
	Sub-category 1.6	60
	Sub-category 1.7	10
	Sub-category 1.8	10
	Sub-category 1.9	100
	Sub-category 1.10	90
Category 2	Sub-category 2.1	60
	Sub-category 2.2	100
	Sub-category 2.3	100
	Sub-category 2.4	40
	Sub-category 2.5	10
	Sub-category 2.6	60
	Sub-category 2.7	100
	Sub-category 2.8	100
	Sub-category 2.9	10
	Sub-category 2.10	40
Category 3	Sub-category 3.1	100
	Sub-category 3.2	100
	Sub-category 3.3	60
	Sub-category 3.4	100
	Sub-category 3.5	100
	Sub-category 3.6	100
	Sub-category 3.7	100
	Sub-category 3.8	100
	Sub-category 3.9	100
	Sub-category 3.10	100

[illegible]

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	90
	Sub-category 1.3	50
	Sub-category 1.4	60
	Sub-category 1.5	55
	Sub-category 1.6	85
	Sub-category 1.7	75
	Sub-category 1.8	10
	Sub-category 1.9	100
	Sub-category 1.10	95
Category 2	Sub-category 2.1	10
	Sub-category 2.2	40
	Sub-category 2.3	30
	Sub-category 2.4	90
	Sub-category 2.5	20
	Sub-category 2.6	80
	Sub-category 2.7	100
	Sub-category 2.8	70
	Sub-category 2.9	25
	Sub-category 2.10	40
Category 3	Sub-category 3.1	10
	Sub-category 3.2	85
	Sub-category 3.3	30
	Sub-category 3.4	95
	Sub-category 3.5	80
	Sub-category 3.6	10
	Sub-category 3.7	90
	Sub-category 3.8	25
	Sub-category 3.9	95
	Sub-category 3.10	80
Category 4	Sub-category 4.1	10
	Sub-category 4.2	60

[illegible]

25 reaction to Protonix?

[illegible]

[illegible]

A horizontal bar chart comparing the percentage of respondents who believe the current administration is responsible for the current state of the world, categorized by age group and gender. The chart uses a color-coded system: blue for 18-29, orange for 30-49, green for 50-64, red for 65+, and purple for Male, and pink for Female. The x-axis represents the percentage from 0 to 100. The y-axis lists age groups and gender categories. The data shows that younger age groups (18-29) and females generally have higher percentages of respondents believing the current administration is responsible, while older age groups (65+) and males generally have lower percentages.

Category	Percentage (%)
18-29	75
30-49	65
50-64	55
65+	45
Male	50
Female	70
18-29 Male	70
18-29 Female	80
30-49 Male	60
30-49 Female	70
50-64 Male	50
50-64 Female	60
65+ Male	40
65+ Female	50
Male 18-29	70
Male 30-49	60
Male 50-64	50
Male 65+	40
Female 18-29	80
Female 30-49	70
Female 50-64	60
Female 65+	50

[illegible]

Row	Category	Value (approximate)
1	Category 1	10
2	Category 2	70
3	Category 3	100
4	Category 4	20
5	Category 5	20
6	Category 6	80
7	Category 7	15
8	Category 8	90
9	Category 9	75
10	Category 10	100
11	Category 11	10
12	Category 12	85
13	Category 13	10
14	Category 14	90
15	Category 15	100
16	Category 16	10
17	Category 17	90
18	Category 18	100
19	Category 19	85
20	Category 20	15
21	Category 21	90
22	Category 22	55
23	Category 23	10
24	Category 24	75
25	Category 25	55

Row	Bar Length (approx. % of total width)
1	95
2	35
3	45
4	20
5	70
6	35
7	75
8	35
9	95
10	95
11	15
12	30
13	100
14	40
15	45
16	20
17	70
18	20
19	45
20	35
21	90
22	35
23	65
24	95
25	100

[illegible]

[illegible]

Category	Sub-category	Value
Category 1	Sub-category 1.1	100
	Sub-category 1.2	85
	Sub-category 1.3	75
	Sub-category 1.4	55
	Sub-category 1.5	30
	Sub-category 1.6	45
	Sub-category 1.7	25
	Sub-category 1.8	80
	Sub-category 1.9	20
	Sub-category 1.10	70
Category 2	Sub-category 2.1	90
	Sub-category 2.2	70
	Sub-category 2.3	95
	Sub-category 2.4	40
	Sub-category 2.5	55
	Sub-category 2.6	98
	Sub-category 2.7	35
	Sub-category 2.8	65
	Sub-category 2.9	50
	Sub-category 2.10	45
Category 3	Sub-category 3.1	30
	Sub-category 3.2	25
	Sub-category 3.3	60
	Sub-category 3.4	55
	Sub-category 3.5	20
	Sub-category 3.6	15
	Sub-category 3.7	40
	Sub-category 3.8	75
	Sub-category 3.9	35
	Sub-category 3.10	25
Category 4	Sub-category 4.1	85
	Sub-category 4.2	90
	Sub-category 4.3	75
	Sub-category 4.4	30
	Sub-category 4.5	25
	Sub-category 4.6	65
	Sub-category 4.7	45
	Sub-category 4.8	55
	Sub-category 4.9	70
	Sub-category 4.10	80

23 MR. LAFATA: The point is well taken.
24 Let's go off the record for a short break.
25 THE VIDEOGRAPHER: At 10:27 a.m. we are

1 going off the record.

2 (Brief recess taken.)

3 (Deposition Exhibit No. 4 was marked for
4 identification.)

5 THE VIDEOGRAPHER: At 10:45 a.m. we're
6 back on the record.

7 BY MR. LAFATA:

8 Q. Mrs. Crawford, are you ready to continue?

9 A. I am.

[REDACTED]

[illegible]

[illegible]

Row	Bar Length (approx. % of total width)
1	5
2	85
3	10
4	65
5	25
6	100
7	20
8	50
9	10
10	60
11	25
12	75
13	40
14	95
15	50
16	90
17	45
18	100
19	40
20	90
21	10
22	80
23	15
24	65
25	10
26	85
27	30

Category	Item	Value
Category 1	Item 1.1	100
	Item 1.2	50
	Item 1.3	80
	Item 1.4	30
	Item 1.5	70
	Item 1.6	20
	Item 1.7	90
	Item 1.8	60
	Item 1.9	40
	Item 1.10	10
Category 2	Item 2.1	120
	Item 2.2	70
	Item 2.3	90
	Item 2.4	50
	Item 2.5	110
	Item 2.6	30
	Item 2.7	80
	Item 2.8	60
	Item 2.9	40
	Item 2.10	20
Category 3	Item 3.1	150
	Item 3.2	80
	Item 3.3	100
	Item 3.4	60
	Item 3.5	130
	Item 3.6	40
	Item 3.7	90
	Item 3.8	70
	Item 3.9	50
	Item 3.10	30
Category 4	Item 4.1	180
	Item 4.2	90
	Item 4.3	110
	Item 4.4	70
	Item 4.5	140
	Item 4.6	50
	Item 4.7	100
	Item 4.8	80
	Item 4.9	60
	Item 4.10	40
Category 5	Item 5.1	200
	Item 5.2	100
	Item 5.3	120
	Item 5.4	80
	Item 5.5	160
	Item 5.6	60
	Item 5.7	110
	Item 5.8	90
	Item 5.9	70
	Item 5.10	50

[illegible]

A horizontal bar chart with 20 rows. Each row has a small black square on the left, followed by a text label, and then a horizontal bar representing a percentage. The bars are black and extend to the right. The categories and their approximate percentages are as follows:

Category	Percentage
1	10%
2	90%
3	35%
4	85%
5	38%
6	12%
7	100%
8	45%
9	95%
10	65%
11	25%
12	40%
13	20%
14	45%
15	35%
16	100%
17	60%
18	25%
19	85%
20	40%

[illegible]

[illegible]

1	2	3
4	5	6
7	8	9
10	11	12
13	14	15
16	17	18
19	20	21
22	23	24
25	26	27
28	29	30
31	32	33
34	35	36
37	38	39
40	41	42
43	44	45
46	47	48
49	50	51
52	53	54
55	56	57
58	59	60
61	62	63
64	65	66
67	68	69
70	71	72
73	74	75
76	77	78
79	80	81
82	83	84
85	86	87
88	89	90
91	92	93
94	95	96
97	98	99
100	101	102

[illegible]

[illegible]

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	90
	Sub-category 1.3	80
Category 2	Sub-category 2.1	10
	Sub-category 2.2	20
	Sub-category 2.3	70
Category 3	Sub-category 3.1	10
	Sub-category 3.2	20
	Sub-category 3.3	30
Category 4	Sub-category 4.1	10
	Sub-category 4.2	20
	Sub-category 4.3	25
Category 5	Sub-category 5.1	10
	Sub-category 5.2	30
	Sub-category 5.3	40
Category 6	Sub-category 6.1	10
	Sub-category 6.2	20
	Sub-category 6.3	30
Category 7	Sub-category 7.1	10
	Sub-category 7.2	30
	Sub-category 7.3	40
Category 8	Sub-category 8.1	10
	Sub-category 8.2	90
	Sub-category 8.3	10
Category 9	Sub-category 9.1	20
	Sub-category 9.2	30
	Sub-category 9.3	25
Category 10	Sub-category 10.1	70
	Sub-category 10.2	95
	Sub-category 10.3	50
Category 11	Sub-category 11.1	100
	Sub-category 11.2	30

Year	Country	Value
2000	United States	100
2001	United States	100
2002	United States	100
2003	United States	100
2004	United States	100
2005	United States	100
2006	United States	100
2007	United States	100
2008	United States	100
2009	United States	100
2010	United States	100
2011	United States	100
2012	United States	100
2013	United States	100
2014	United States	100
2015	United States	100
2016	United States	100
2017	United States	100
2018	United States	100
2019	United States	100
2020	United States	100
2021	United States	100
2022	United States	100
2023	United States	100
2024	United States	100
2025	United States	100
2026	United States	100
2027	United States	100
2028	United States	100
2029	United States	100
2030	United States	100
2031	United States	100
2032	United States	100
2033	United States	100
2034	United States	100
2035	United States	100
2036	United States	100
2037	United States	100
2038	United States	100
2039	United States	100
2040	United States	100
2041	United States	100
2042	United States	100
2043	United States	100
2044	United States	100
2045	United States	100
2046	United States	100
2047	United States	100
2048	United States	100
2049	United States	100
2050	United States	100
2051	United States	100
2052	United States	100
2053	United States	100
2054	United States	100
2055	United States	100
2056	United States	100
2057	United States	100
2058	United States	100
2059	United States	100
2060	United States	100
2061	United States	100
2062	United States	100
2063	United States	100
2064	United States	100
2065	United States	100
2066	United States	100
2067	United States	100
2068	United States	100
2069	United States	100
2070	United States	100
2071	United States	100
2072	United States	100
2073	United States	100
2074	United States	100
2075	United States	100
2076	United States	100
2077	United States	100
2078	United States	100
2079	United States	100
2080	United States	100
2081	United States	100
2082	United States	100
2083	United States	100
2084	United States	100
2085	United States	100
2086	United States	100
2087	United States	100
2088	United States	100
2089	United States	100
2090	United States	100
2091	United States	100
2092	United States	100
2093	United States	100
2094	United States	100
2095	United States	100
2096	United States	100
2097	United States	100
2098	United States	100
2099	United States	100

Category	Percentage
1	5%
2	2%
3	5%
4	2%
5	7%
6	2%
7	6%
8	2%
9	8%
10	2%
11	100%
12	2%
13	5%
14	2%
15	3%
16	2%
17	8%
18	2%
19	7%
20	3%

21 Q. Do you own a charcoal or a gas barbecue at
22 your home?

23	A. Gas.
----	---------

24	Q. Do you use the gas barbecue?
----	---------------------------------

25 A. In the summer.

1 Q. What sort of things do you barbecue?

2 A. Chicken, beef.

3 Q. About how often would you barbecue chicken or
4 beef?

5 A. Maybe once a week.

6 Q. Pork, do you use the pork on the barbecue?

7 A. No.

8 Q. What about sausage or frankfurters?

9 A. I don't eat that, no.

10 Q. Okay. Do you barbecue hamburgers?

11 A. Yes.

12 Q. Steak?

13 A. Yes.

14 Q. Fish?

15 A. No.

16 Q. No? Don't like fish?

17 A. No.

18 Q. Do you barbecue vegetables?

19 A. No.

20 Q. Do you eat them raw?

21 A. Usually, yes.

22 Q. Or steamed?

23 A. Mm-hmm.

24 Q. Yes?

25 A. Yes.

1	Q. Do you exercise regularly?
---	-------------------------------

2	A. No.
---	--------

Row	Bar Length (approx. % of total width)
1	95
2	65
3	98
4	95
5	25
6	15
7	60
8	70
9	95
10	100
11	40
12	15
13	85
14	25
15	95
16	35
17	50
18	20
19	60
20	25
21	95
22	55
23	15

[illegible]

Category	Value
1	100
2	100
3	100
4	95
5	95
6	90
7	95
8	80
9	20
10	60
11	90
12	25
13	100
14	50
15	95
16	35
17	50
18	20
19	70
20	95
21	30 40
22	45
23	30 20
24	30ea have some sort of Asperger's

25

condition?

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	100
	Sub-category 1.3	90
	Sub-category 1.4	85
Category 2	Sub-category 2.1	20
	Sub-category 2.2	70
	Sub-category 2.3	10
	Sub-category 2.4	95
Category 3	Sub-category 3.1	100
	Sub-category 3.2	98
	Sub-category 3.3	95
	Sub-category 3.4	92
Category 4	Sub-category 4.1	45
	Sub-category 4.2	10
	Sub-category 4.3	25
	Sub-category 4.4	50
Category 5	Sub-category 5.1	10
	Sub-category 5.2	30
	Sub-category 5.3	10
	Sub-category 5.4	50
Category 6	Sub-category 6.1	85
	Sub-category 6.2	10
	Sub-category 6.3	45
	Sub-category 6.4	60
Category 7	Sub-category 7.1	10
	Sub-category 7.2	50
	Sub-category 7.3	10
	Sub-category 7.4	55

[illegible]

[illegible]

Row	Bar Length (approx. % of total width)
1	5
2	45
3	35
4	60
5	100
6	48
7	10
8	95
9	15
10	5
11	38
12	12
13	28
14	50
15	42
16	10
17	58
18	12
19	92
20	18
21	10

22 Q. Ms. Crawford, what's your general
23 understanding about what this lawsuit is
24 about?

25 A. It's about -- it's about contamination of the

1 soil, the water, the aquifer, the surface
2 water, by PFOA.

3 Q. Contamination by whom?

4 A. Saint-Gobain.

5 Q. What's your general understanding about what
6 you think Saint-Gobain did wrong in this case?

7 A. Well, they were using PFOA, a manmade
8 chemical, in their manufacturing process, and
9 it's alleged that they disposed of the waste
10 products from that which contained PFOA and
11 not the correct way. It was dumped onto the
12 ground. It was put into the air by the
13 smokestacks. It was stored improperly.

14 Q. And what's your general understanding about
15 the relief that you are seeking in this case
16 for those things?

17 A. We want safe water to drink, so we need to be
18 hooked up to the municipal water.

19 My house and the houses of all those in
20 the state-defined zone of contamination have
21 lost value. We're all upset thinking that our
22 house is sitting on top of a contaminated
23 aquifer.

24 We are concerned about the need for
25 medical monitoring because we understand that

1 you can be exposed to a toxic chemical and it
2 can be latent in your body for years and then
3 all of a sudden you have cancer. So we
4 believe we need medical monitoring by experts.

5 Q. Anything else?

6 A. Could you repeat the original question?

7 Q. Yeah. What's your general understanding about
8 the relief you are seeking in the case?

9 You went through a number of things. I
10 want to make sure I got your understanding.

11 A. I think people need to be compensated for the
12 distress and the damage to their homes and
13 their bodies.

14 Q. Anything else?

15 A. Not that I can think of right now.

16 Q. You used a phrase, zone of contamination.
17 What is that?

18 A. That's an area in Bennington and North
19 Bennington that the State of Vermont has
20 determined has been contaminated by PFOA that
21 came from ChemFab.

22 Q. Do you understand this to be a -- what's
23 called a class action case?

24 A. Yes.

25 Q. You heard that phrase?

1 A. Yes.

2 Q. Do you understand that you are being offered
3 as a representative of a class?

4 A. Yes.

5 Q. What is your understanding in general about
6 your duties as a representative of the class?

7 A. My duties is to gather all the documentation
8 that we needed for discovery, to meet with the
9 counsel, to just represent everybody in a
10 fair, equal way.

11 Q. Anything else?

12 A. Not that I can think of now.

13 Q. When did you first learn about PFOA?

14 A. I think it was the summer of '16.

15 Q. Where were you when you first heard about
16 PFOA?

17 A. Home.

18 Q. How did you first hear about it?

19 A. The paper.

20 Q. Which paper?

21 A. The Bennington Banner.

22 Q. Do you recall what you heard in the paper in
23 the summer of '16 when you first heard about
24 PFOA?

25 A. You are talking about in Bennington and North

1 Bennington?

2 Q. When you first heard about it.

3 A. Okay. Because I heard about it maybe a little
4 bit before that in Hoosick Falls. So I have
5 friends that live in Hoosick Falls, and, you
6 know, they were talking about PFOA; and I felt
7 kind of superior because I was fine, we didn't
8 have it. And then I read about a man in North
9 Bennington who was concerned and got a well
10 tested, either his or his family's, and it was
11 positive for PFOA.

12 So then the state got involved, started
13 testing wells, and they kept expanding the
14 zone of contamination. I think one of the
15 workers from the state said that they kept
16 testing wells. They would get a positive
17 reading. They would move the boundary a
18 little farther. And their plan was to keep
19 moving it until they didn't find any PFOA, and
20 they kept moving it until my house was
21 included.

22 Q. So was the first time that you heard about
23 PFOA from some friends of yours in Hoosick
24 Falls, New York?

25 A. Probably a few months before it hit

1 Bennington.

2 Q. And where were you when you first heard about
3 PFOA from your friends in New York?

4 A. Probably the grocery store. That is where I
5 see all my friends.

6 Q. What was the sum and substance of what you
7 talked about?

8 MS. JOSELSON: If you recall.

9 A. I don't recall exactly, but I know they were
10 very upset.

11 BY MR. LAFATA:

12 Q. What do you recall that they said, if
13 anything?

14 A. That they just were scarred and they didn't
15 know what was going to happen.

16 Q. Who were they?

17 A. Oh, God, I don't recall.

18 Q. Where was the grocery store?

19 A. Bennington.

20 Q. After you heard about PFOA -- what is -- let
21 me rephrase it.

22 Do you know what PFOA stands for?

23 A. Perfluorooctanoic something.

24 Q. Okay. Have you ever spoken to any of your
25 physicians about PFOA?

1 A. Yes.

2 Q. Which ones?

3 A. Dr. Carroll.

4 Q. Any others?

5 A. No.

6 Q. What did you talk about with Dr. Carroll about
7 PFOA?

8 A. Well, I shared my blood results with him, and
9 it -- you know, he's a family practitioner.
10 He's not an expert. So it's in my chart that
11 I have been exposed to an environmental toxin.
12 And, you know, he's trained to deal with
13 symptoms, so if I am asymptomatic at this
14 point -- he's not doing any extra monitoring.
15 That's why I want medical monitoring by
16 experts that know that these things can be
17 latent for years and years, and then, oh, gee,
18 you've got cancer throughout your whole body.

19 Q. Did Dr. Carroll refer you to an expert?

20 A. No. It's all new to him.

21 Q. Did Dr. Carroll say whether or not PFOA could
22 increase your risk of any condition?

23 A. No. He didn't want to commit to that.

24 Q. Did he say he didn't want to commit to that?

25 A. No, he didn't. That was my impression.

1 Q. Dr. Carroll did not tell you that being
2 exposed to PFOA could increase your risk for
3 anything, did he?

4 MS. JOSELSON: Objection.

5 A. He didn't specifically say that, but I know
6 that from reading.

7 BY MR. LAFATA:

8 Q. Did you ask him that?

9 A. No.

10 Q. You mentioned you had a blood test for PFOA.

11 Who performed the blood test?

12 A. It was set up by Vermont State Health
13 Department.

14 Q. Did you pay for the blood test?

15 A. No.

16 Q. How many blood tests did you have for PFOA?

17 A. One.

18 Q. Where did you have the test performed?

19 A. At the Department of Health office in
20 Bennington.

21 Q. Did you get the results of the test?

22 A. I do.

23 Q. Do you recall what the results were?

24 A. 2.8.

25 Q. 2.8 what, if you know?

1 A. Mic -- I'm not sure if it's micrograms or
2 milligrams. I don't know.

3 Q. Of some unit? Some unit of measurement?

4 A. Yes.

5 Q. Did you take the test results to Dr. Carroll?

6 A. They were sent to him by the lab that did the
7 testing.

8 Q. Did Dr. Carroll recommend any further blood
9 test with respect to PFOA?

10 A. No. He wanted me to just -- you know, I
11 stay -- I will do what the State of Vermont
12 recommends, and that is basically who he knows
13 is monitoring the situation and knows more
14 about it than he does.

15 Q. Have you sustained, do you believe, any
16 medical condition today as a result of PFOA
17 exposure?

18 A. I have no evidence of that.

19 (Deposition Exhibit No. 8 was marked for
20 identification.)

21 Q. Mr. Crawford, do you see a copy of Exhibit 8
22 in front of you?

23 A. I do.

24 Q. Flip through this for a second. Do you see a
25 couple pages here?

1 Do you see at the top of page one it's
2 dated July 21, 2016?

3 A. Yes.

4 Q. Do you see it's addressed to you at the top?

5 A. Yes.

6 Q. And would you turn with me to the second page?
7 At the top there it says your test results --
8 is this the 2.8 you were recalling?

9 A. Yes.

10 Q. Micrograms per liter in this case?

11 A. Yes.

12 Q. Do you see the first bullet there says, most
13 people in the U.S. have less than 5.7
14 micrograms per liter of PFOA in their blood?

15 Do you see that?

16 A. Yes.

17 Q. Do you recall talking to Dr. Carroll or any
18 other doctor about how your PFOA level
19 compares to most people in the United States?

20 A. No.

21 Q. Would you come back to page one?

22 Do you see there is a second paragraph,
23 what does my test result mean?

24 A. Yes.

25 Q. Do you see that?

1 A. Mm-hmm.

2 Q. And the next sentence do you see it says,
3 almost everyone in the United States has PFOA
4 in their blood.

5 Do you see that?

6 A. Yes.

7 Q. Do you recall any discussions with Dr. Carroll
8 or any other physician about most people
9 having PFOA in their blood in the United
10 States?

11 A. No.

12 Q. Do you see two paragraphs down there is a
13 paragraph that starts with it's important?

14 A. Yes.

15 Q. It says, it's important to know what your test
16 results cannot tell you.

17 Do you see that?

18 A. Yes.

19 Q. It says, your test result cannot tell you if
20 your exposure to PFOA will cause you health
21 problems in the future or if a condition you
22 have now is caused by this exposure.

23 Do you see that?

24 A. Yes.

25 Q. Do you recall talking to Dr. Carroll about

1 this statement from Vermont?

2 A. No.

3 Q. Do you agree with this statement?

4 MS. JOSELSON: Objection. Calls for
5 expert opinion. You can answer it if you
6 understand it.

7 A. I think that's why it's important that we have
8 medical monitoring by experts, people that
9 know what PFA -- PFOA does as it's circulating
10 in your body or depositing in your kidneys and
11 your liver. I think an expert in the field of
12 toxic exposures would know what to look for
13 early, so you get early detection before you
14 did have full-blown cancer or something like
15 that.

16 BY MR. LAFATA:

17 Q. You mentioned earlier that you had your water
18 tested for PFOA.

19 Do you recall that?

20 A. I do.

21 Q. How many times was your water tested for PFOA?

22 A. Four.

23 Q. And who did the testing of your water those
24 four times?

25 A. I don't recall the name of the company. I

1 believe it was someone that was contracted by
2 the State of Vermont.

3 Q. Did you pay for any of the water testing?

4 A. No.

5 Q. Do you know where the water was collected on
6 your property for the water testing?

7 A. Yes.

8 Q. Where was it collected?

9 A. Out of my kitchen sink.

10 Q. Anywhere else?

11 A. No.

12 Q. Was any water collected from -- do you have a
13 well -- let me withdraw.

14 Do you have a well at your property?

15 A. Yes.

16 Q. Was any water collected from your well?

17 A. No. It's a sealed system.

18 Q. Do you have any water filter installed on your
19 property?

20 A. No.

21 (Deposition Exhibit No. 9 was marked for
22 identification.)

23 Q. All right. Mrs. Crawford, this is copy of
24 Exhibit 9. It's sideways. Okay.

25 Do you see at the top there it says,

1 analytical results perfluorinated chemicals?

2 Do you see that?

3 A. I do.

4 Q. And there's handwriting, 643 West Road at the
5 top?

6 A. Yes.

7 Q. Is that your address?

8 A. Yes.

9 Q. Is that your handwriting?

10 A. No.

11 Q. Do you see beneath that there's a date,
12 printed May 3, 2016?

13 A. Yes.

14 Q. Do you recall receiving a test result of your
15 water in May of 2016?

16 A. I do.

17 Q. And there is a row here, fourth from the top,
18 for PFOA.

19 Do you see that?

20 A. I do.

21 Q. And under the result do you see it says ND?

22 A. Yes.

23 Q. Do you understand that to mean non detect?

24 A. I do.

25 Q. Do you recall receiving a test result of your

1 water in May for non detect for PFOA?

2 MS. JOSELSON: Objection. Asked and
3 answered, but you can answer it again.

4 A. Yes.

5 BY MR. LAFATA:

6 Q. And you had your water tested again after
7 this, right?

8 A. I did.

9 Q. Let's look at that.

10 (Deposition Exhibit No. 10 was marked for
11 identification.)

12 Q. Ms. Crawford, do you have a copy of Exhibit 10
13 in front of you?

14 A. I do.

15 Q. On the first page, do you see there's a letter
16 from the State of Vermont?

17 A. Yes.

18 Q. And it's dated October 10, 2016?

19 A. Yes.

20 Q. And it's addressed to Mr. Crawford?

21 A. Yes.

22 Q. Do you recall receiving a letter from the
23 State of Vermont in October of 2016 with water
24 test results?

25 A. Yes.

1 Q. Would you turn to the second page, please?

2 Do you see at the top there it says 643

3 West Road?

4 A. Yes.

5 Q. And is that your handwriting here?

6 A. No.

7 Q. Do you recognize the handwriting?

8 A. No.

9 Q. Okay. Do you see beneath the handwriting it
10 says printed September 28, 2016?

11 A. Yes.

12 Q. Okay. And about four lines down there's a row
13 for PFOA. Do you see that?

14 A. Yes.

15 Q. And do you see the result says ND?

16 A. Yes.

17 Q. Do you understand that to mean not detect?

18 A. Yes.

19 Q. Okay. You had another test after this --

20 A. Yes.

21 Q. -- right.

22 (Deposition Exhibit No. 11 was marked for
23 identification.)

24 Q. Mrs. Crawford, you have a copy of Exhibit 11
25 in front of you?

1 A. Yes.

2 Q. Do you see the first page of the letter from
3 the State of Vermont to Theodore and Linda
4 Crawford?

5 A. Yes.

6 Q. And it's dated June 21, 2017, right?

7 A. Yes.

8 Q. At the top? And the second page has some test
9 results, right?

10 A. Yes.

11 Q. And at the top there of the second page it
12 says, sampling point 643 West Road?

13 A. Yes.

14 Q. That's your address?

15 A. Yes.

16 Q. And do you see there is a row for PFOA on the
17 chart there?

18 A. I do.

19 Q. And third from the bottom, do you see the row
20 for PFOA?

21 A. I do.

22 Q. And you see in the result it says 4.1? Do you
23 see that?

24 A. Yes.

25 Q. And the unit is nanograms per liter?

1 A. Yes.

2 Q. And then there is some handwriting below this,
3 PFOA 4.1 ppt. Do you see that?

4 A. Yes.

5 Q. Do you recognize the handwriting?

6 A. No.

7 Q. Would you turn back to the first page?

8 Do you see in the second paragraph it
9 starts with CT Male?

10 A. Yes.

11 Q. It says: CT Male, the consultant for
12 Saint-Gobain, resampled your water supply well
13 following a resampling plan approved by WMPD.

14 Do you see that?

15 A. Yes.

16 Q. Do you understand the resampling was done by
17 CT Male, a consultant for Saint-Gobain?

18 A. Yes.

19 Q. In the paragraph above that, do you see there
20 is a sentence in the middle that starts with
21 lab results?

22 A. Yes.

23 Q. Lab results show that your well contains
24 concentrations of PFOA above laboratory
25 detection limits but less than 20 nanograms

1 per liter, which is the State of Vermont's
2 drinking water standard.

3 Do you see that?

4 A. I do.

5 Q. Do you understand this to indicate to you that
6 your water levels of PFOA were less than the
7 State of Vermont's safety standard?

8 MS. JOSELSON: Objection, but you can
9 answer.

10 A. I understand but I don't -- it doesn't give me
11 any comfort.

12 BY MR. LAFATA:

13 Q. Do you disagree with the level the State of
14 Vermont has set?

15 MS. JOSELSON: Objection. Calls for
16 expert opinion, but you can answer it if you
17 understand it.

18 A. Well, there's no uniform standard. I mean,
19 New Jersey is what, 13, 14. I mean -- and
20 these are today's standards, and I know that
21 with more investigation -- excuse me. The
22 standards could change. My 4.1 could be, oh,
23 my God.

24 So I just don't have any faith in -- all
25 I know is I have it, and I didn't ask for it,

1 and I don't want it, any of it.

2 BY MR. LAFATA:

3 Q. 4.1 nanograms per liter, that would be even
4 less than the New Jersey standard you
5 mentioned, correct?

6 A. It would, but it's something. I want it to be
7 non detect. But I understand what you are
8 saying, but I also understand that -- it
9 doesn't comfort me, because what is it today?
10 You know, the aquifer is moving. My neighbors
11 are 70 and whatever. Is that going to come
12 over to my house?

13 Q. You used the word aquifer a few times.

14 What is an aquifer?

15 A. It's the underground water level table.

16 Q. And do you know anything about the aquifer
17 under your property?

18 A. I'm not an expert in it, but I know it's
19 contaminated because it serves me and all my
20 neighbors, and my neighbors have it higher
21 than I do but some lower.

22 Q. Do you know how deep your aquifer is on your
23 property?

24 A. No. My well is 300 feet.

25 Q. And may I ask how you know it's 300 feet?

1 A. Because we had a new submersible pump put in
2 to replace an old jet pump, which was 180
3 feet. And the man that did it said, you know,
4 with this new pump we can put you down
5 300 feet because you've got water that deep.
6 So we said sure, so...

7 Q. How deep was the original pump?

8 A. 180.

9 Q. And the new pump was submerged?

10 A. Yes, 300 feet.

11 Q. Did the person who replaced your pump have to
12 drill your well deeper to do that?

13 A. A little, yes.

14 Q. Who replaced your pump?

15 A. I don't recall his name. It's been a while.

16 Q. Do you remember the company he worked for?

17 A. Well, the owner did it. I don't -- it's in my
18 paperwork, but...

19 Q. Okay. And how much did you pay to have the
20 pump replaced?

21 A. An estimate of about 5 or \$6,000.

22 Q. When did you do that?

23 A. '95, I think.

24 Q. And what was the need -- let me rephrase that.

25 What caused you to need to replace your

1 well pump?

2 A. It wore -- it just wore out.

3 Q. Was it no longer pumping appropriately?

4 A. Right.

5 Q. Do you know how old the prior pump was?

6 A. I don't. It was there when we bought the
7 house.

8 Q. Other than replacing the pump on your well,
9 have you done any maintenance work on the well
10 or had it done?

11 A. No. It's worked fine.

12 Q. You said that your well has a sealed system
13 earlier.

14 Do you remember that?

15 A. Mm-hmm.

16 Q. What did you mean by that?

17 A. Well, you can't just -- you know, like the old
18 wells you could move the cover and look in.

19 You can't. It's -- it's something that comes
20 above the ground, and it's just -- it's all
21 sealed. You would have to unlock it and
22 whatever to get in. So it's a sealed system.

23 Q. For your well, does the water pump into
24 holding tanks on your property?

25 A. No.

1 Q. It pumps directly into your house?

2 A. Mm-hmm.

3 Q. Is there a delay period when you use water in
4 your house for the water to come?

5 A. No.

6 Q. When you had the pump installed for your well,
7 did you have the water quality tested?

8 A. Yes.

9 Q. What were the results of the test?

10 A. Within normal limits. I don't remember
11 anything being pointed out to us that we
12 should be concerned about.

13 Q. Do you have a copy of the well -- the water
14 quality test when you replaced your pump?

15 A. Not that I recall. We probably did, but I
16 have no idea where it could be.

17 Q. Do you recall whether the testing included
18 anything for heavy metals?

19 A. I don't know if that would be part of the
20 routine testing or not.

21 Q. Did you have anyone interpret the test results
22 for you?

23 A. No.

24 Q. Do you recall who performed the water quality
25 test?

1 A. I believe the State of Vermont.

2 Q. Do you recall whether they wrote you anything
3 to tell you what the results were, anything
4 like that?

5 A. I am sure they did, but I have no idea where
6 it could be. It's been a long time.

7 Q. Is the well pump powered by your home's power
8 supply?

9 A. Yes.

10 Q. And what is your home's power supply?

11 A. Electric.

12 Q. You are plugged into the -- I guess the city's
13 system for power; is that right?

14 A. We get it -- we're not off the grid. We're on
15 the grid, whatever that is.

16 Q. That's it. That's it.

17 Do you use solar power, for example?

18 A. No.

19 Q. Okay. You've got an electric meter at your
20 house?

21 A. Yes.

22 THE VIDEOGRAPHER: Counsel, you have just
23 about five minutes, a little over five
24 minutes.

25 MR. LAFATA: Let's change the tape.

1 MR. SILVER: Well, you've got -- it's
2 quarter of like -- it's almost quarter of 12,
3 so --

4 MR. LAFATA: Let's at least change the
5 tape. That was a pretty long break earlier.
6 I just want to keep it moving.

7 THE VIDEOGRAPHER: At 11:39 a.m. we are
8 now going off the record and closing out media
9 unit number one. We are off the record.

10 (Off-the-record colloquy.)

11 THE VIDEOGRAPHER: At 11:44 a.m. we are
12 now coming back on the record and beginning
13 media unit number two with the deposition of
14 Linda Crawford. We are on the record.

15 BY MR. LAFATA:

16 Q. All right. Ms. Crawford, what's the highest
17 level of education that you obtained?

18 A. I have an associate's degree in nursing.

19 Q. When did you obtain your associate's degree in
20 nursing?

21 A. 1974.

22 Q. And who issued the degree?

23 A. Castleton University.

24 Q. Casselson University?

25 A. Castleton.

1 Q. Where is Castleton University?

2 A. In Castleton, Vermont.

3 Q. After you obtained your degree in nursing, did
4 you then get a nursing license?

5 A. Yes.

6 Q. What did you have to do to get a nursing
7 license?

8 A. Take two days of testing.

9 Q. Is that state testing?

10 A. Yes.

11 Q. And when did you obtain your nursing license?

12 A. Within weeks.

13 Q. Weeks of graduating?

14 A. Yes.

15 Q. Do you have to take, during the time you have
16 a nursing license, any continuing medical
17 education to maintain the license?

18 A. No. I think you might now, but you didn't at
19 the time I have had.

20 Q. Was there a time when you took any of those
21 classes?

22 A. Sure.

23 Q. Do you recall what some of the subjects may
24 have been in those classes?

25 A. I took the legal aspects of nursing, and I --

1 we had ongoing classes at the facilities I
2 worked at. We had ongoing education.

3 Q. They provided onsite?

4 A. They provided. I would go to seminars in
5 Albany, you know, paid for by my employer and
6 things like that.

7 They were usually on -- like some of the
8 super bugs, we had to go to learn how to --
9 the universal precautions, those type of
10 things, you know, as things evolve and things
11 develop.

12 Q. Keeping up to date?

13 A. Keeping up to date.

14 Q. Do you recall taking any of those classes on
15 medications, pharmacy medications?

16 A. Yes.

17 Q. What are some of the things that might be
18 covered in those, if you remember?

19 A. They were just the newer -- newer drugs that
20 came out, newer antibiotics, newer
21 psychosomatic/psychotropic drugs, what side
22 effects to look for, how they worked.

23 Q. Did you take any of these classes on
24 diagnostics?

25 A. No.

1 Q. During your nursing work, do you recall ever
2 diagnosing a patient with any condition?

3 A. That's against the law. Nurses cannot
4 diagnose.

5 Q. So I take it that's a no?

6 A. That's a no.

7 Q. Did you take any of the medical courses in
8 laboratory testing?

9 A. No.

10 Q. Any blood testing?

11 A. No.

12 Q. Before obtaining your associate's degree, was
13 that when you were in high school?

14 A. No. I was out of high school for probably
15 seven, eight years before I went to college.

16 Q. Okay. What did you do during that seven or
17 eight year period between high school and
18 college?

19 A. I got married young and had a couple kids.

20 Q. Where did you live at that time?

21 A. Pawlet, P-a-w-l-e-t, Vermont.

22 Q. Where were you born?

23 A. Grandville, New York.

24 Q. Where did you grow up?

25 A. Pawlet.

1 Q. How old were you when you moved from
2 Grandville, New York, to Pawlet?

3 A. Ten days.

4 Q. Very specific.

5 A. I remember my mother telling me she had to
6 stay in the hospital ten days when she had me.
7 It was routine back then. Now ten minutes.

8 Q. Have you ever assisted with the delivery of a
9 baby?

10 A. In nursing school I did.

11 Q. Did you care for patients while in nursing
12 school?

13 A. Yes.

14 Q. Did you ever care for pediatric patients in
15 nursing school?

16 A. Yes.

17 Q. Geriatric patients?

18 A. Yes.

19 MR. LAFATA: I think a good time to go
20 off the record for lunch.

21 THE VIDEOGRAPHER: At 11:50 a.m. we are
22 now going off the record.

23 (Lunch recess taken.)

24 THE VIDEOGRAPHER: The time now is
25 12:56 p.m. We are now coming back on the

1 record, continuing media unit number two.

2 BY MR. LAFATA:

3 Q. Good afternoon, Ms. Crawford.

4 A. Good afternoon.

5 Q. Are you ready to continue with your
6 deposition?

7 Are you ready to continue with the
8 deposition?

9 A. She told me to breathe before I answered.
10 Yes, I am.

11 Q. Did you have a nice lunch?

12 A. I did. Thank you.

13 Q. What is your current address?

14 A. 643 West Road, Bennington, 05201.

15 Q. How long have you lived at 643 West Road?

16 A. 33 years.

17 Q. When did you move to 643 West Road?

18 A. '85.

19 Q. And you've lived there from 1985 to the
20 present.

21 A. Correct.

22 Q. Where did you move from?

23 A. Evergreen Drive in Bennington, but I don't
24 remember the number.

25 Q. Why did you move from Evergreen Drive to 643

1 West Road?

2 A. Well, that was just a temporary rental, and
3 then Ted and I got married and moved to --
4 bought our own house.

5 Q. Was Evergreen Drive a rental home?

6 A. It was a home, yes.

7 Q. Did you say that Evergreen Drive was in
8 Bennington?

9 A. Yes.

10 Q. Where did you live before Evergreen Drive?

11 A. Pawlet.

12 Q. Is that the city?

13 A. A city?

14 MR. SILVER: I don't think anyone has
15 ever called Pawlet a city.

16 THE WITNESS: No. That may be --

17 MS. JOSELSON: Town, call it a town.

18 THE WITNESS: -- a thousand people. A
19 town.

20 BY MR. LAFATA:

21 Q. Powette is the name of a town.

22 A. Pawlet.

23 Q. We've got a lot of testimony going on.

24 Pawlet, thank you.

25 A. Very small town.

1 Q. Where is Pawlet?

2 A. Wow.

3 MS. JOSELSON: Not far.

4 A. Not far. It's about 40 miles north.

5 BY MR. LAFATA:

6 Q. Okay.

7 MR. SILVER: Northwest.

8 BY MR. LAFATA:

9 Q. Was that a home, Pawlet?

10 A. I went there when I was --

11 MS. JOSELSON: Objection.

12 A. -- ten days old. I am sorry.

13 MS. JOSELSON: That's okay.

14 A. I was born in Granville, which was just a few
15 miles away from Pawlet, and I went home to
16 Pawlet and stayed in Pawlet for 30-something
17 years. I don't get around much.

18 BY MR. LAFATA:

■ ■ [REDACTED]
■ [REDACTED]
■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ ■ [REDACTED]
■ [REDACTED] [REDACTED]
■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

11 Q. Do you have a fireplace there?

12 A. No.

13 Q. A wood burning stove?

14 A. No.

15 Q. A septic tank?

16 A. No.

17 Q. Is 643 West Road a single-family home?

18 A. Yes.

19 Q. Do you own it?

20 A. Yes.

21 Q. What is the home construction, wood or stone
22 or brick?

23 A. Wood.

24 Q. How many bedrooms is it?

25 A. Five.

1 Q. How many bathrooms?

2 A. Two.

3 Q. How many floors?

4 A. Two.

5 Q. Is the first floor below grade or at grade?

6 A. It's -- it's a split level, so it's like a
7 basement only it's finished.

8 Q. Okay. And above that is the second level?

9 A. Yes.

10 Q. What is the square footage approximately, do
11 you know?

12 A. 2040, plus a garage.

13 Q. Is the garage a covered garage?

14 A. Yes, it's used for storage though.

15 Q. Do you park outside the garage?

16 A. (Nod)

17 MR. SILVER: You have to answer.

18 THE WITNESS: Hmm?

19 MR. SILVER: You didn't answer. You
20 shook your head.

21 THE WITNESS: Oh, I'm sorry.

22 MR. LAFATA:: That's all right.

23 BY MR. LAFATA:

24 Q. So is it yes, you parked outside the garage?

25 A. Yes.

1 Q. What sort of things are stored in the garage?

2 A. My husband's tools, bicycles, lawnmower,
3 recyclables.

4 Q. That is about it?

5 A. That's about it.

6 Q. Do you know when the home was built?

7 A. I have read two different dates. One was
8 1961. One was 1965.

9 Q. Where did you read those two dates?

10 A. On -- when we were reassessed to re-mortgage.

11 Q. Both of those dates were on those documents?

12 A. (Nod) .

13 Q. Yes?

14 A. Yes.

15 Q. Do you own any other real property besides
16 your home?

17 A. No.

18 Q. Do you have any vacation property?

19 A. No.

20 Q. How much did your home cost when you bought
21 it?

22 A. 58,5.

23 Q. And how did you pay for the cost of your home?

24 A. A mortgage.

25 Q. Was it all a mortgage?

1 A. No. We paid -- we paid a down payment.

2 Q. Has the mortgage been paid off?

3 A. It will be in July.

4 Q. After you purchased the home, did you have any
5 other mortgages put on the home?

6 A. We refinanced when the rates went down.

7 Twice.

8 Q. You refinanced twice?

9 A. Twice.

10 Q. Do you remember when you refinanced?

11 A. '04 and '08.

12 Q. And why did you refinance in '04 and '08?

13 A. '04 is when the rates went quite low, so we
14 refinanced then. And '08 we needed -- I think
15 that is when we got our furnace. We needed a
16 new furnace and we needed some more home
17 improvements, so we decided to refinance.

18 Q. Refinance to pay for the home improvements?

19 A. Right.

20 Q. Other than buying the furnace, what other home
21 improvements did you have done in your house
22 for that refinancing?

23 MS. JOSELSON: Object to the form. You
24 can answer it if you understand it.

25 A. Well, I think that's when we put all the new

1 replacement windows in.

2 BY MR. LAFATA:

3 Q. Anything else?

4 A. No. Between the two they were quite
5 expensive.

6 Q. Were all of the windows replaced with new
7 windows?

8 A. Mm-hmm. Yes. Yes.

9 Q. Was it the frame as well as the glass?

10 A. Yes.

11 Q. What sort of furnace did you have installed in
12 '08?

13 A. Oil.

14 Q. What was there before?

15 A. Oil.

16 Q. Why did you replace the furnace?

17 A. Age.

18 Q. Why did you replace the windows?

19 A. Age.

20 Q. How much land is -- how much land does your
21 home sit on?

22 A. 1.4 acres.

23 Q. So you have a front lawn?

24 A. Yes.

25 Q. A back yard?

1 A. Yes.

2 Q. Is the front yard grass?

3 A. Yes.

4 Q. Are there any wooded areas in your land?

5 A. Just some sumac in the back but it gives us
6 privacy, so we leave it.

7 Q. Do you have any fences around your land?

8 A. No.

9 Q. About how many sumac is in the back, are in
10 the back?

11 A. Well, not as many as there was before this
12 last storm, but I would say ten.

13 Q. Any other trees around your property?

14 A. We have several maples.

15 Q. How many maples?

16 A. Four.

17 Q. Any other trees on your land?

18 A. A willow.

19 Q. How many of those?

20 A. One.

21 Q. Any other trees?

22 A. I don't think so.

23 Q. You said in the back the sumac provides some
24 privacy.

25 What's beyond the sumac?

1 A. A big lawn and a house.

2 Q. Who lives at that house?

3 A. They just moved in. We met them, but their
4 first names are Sol and Michelle. That's all
5 I know.

6 Q. Do you have neighbors on the other side of
7 your property?

8 A. Yes.

9 Q. Where are they?

10 A. Right and left.

11 Q. Who are the neighbors on the left?

12 A. Donna.

13 Q. Who are the neighbors on the right?

14 A. Lauren, L-a-u.

15 Q. Are those the individuals who live in each
16 house?

17 A. Yes.

18 Q. Do you know whether Donna, Lauren, or -- is it
19 Solomon behind your house?

20 A. Sol.

21 Q. Sol.

22 A. I don't know what his name is.

23 Q. Do you know whether any of them had their
24 water tested for PFOA?

25 A. Oh, yes.

1 Q. Do you know what the results were for those
2 tests?

3 A. I know they were elevated, but I don't recall
4 the numbers.

5 Q. Do you know if any of them had their soil
6 tested for PFOA?

7 A. I don't know that.

8 Q. Has your soil been tested for PFOA?

9 A. No.

10 Q. Where on your property is your well?

11 A. Right off the back deck.

12 Q. Do you receive municipal water in addition to
13 your well water, or do you just use well
14 water?

15 A. We haven't been hooked up yet.

16 Q. Do you intend to get hooked up?

17 A. Yes.

18 Q. We talked about the new pump you had put in
19 your well earlier.

20 Are there any other maintenance you have
21 done on the well?

22 A. No.

23 Q. Before 2016, did you ever consider trying to
24 get hooked up to the municipal water?

25 A. No.

1 Q. Why is that?

2 A. Because my well water tastes good; it's free
3 of chemicals; it works, why fix it; never run
4 out of water; and we don't have to pay that
5 quarterly fee for town water.

6 Q. What is the quarterly fee for town water?

7 A. I'm not sure, but I think it's like 150 to 200
8 a quarter. It keeps going up.

9 Q. Other than your house, are there any other
10 structures on your land?

11 A. No.

12 Q. Is there any wood shed or tool shed?

13 A. No.

14 Q. Is the garage connected to your house?

15 A. Yes. Well, there is no inside -- there is no
16 egress into the house itself, but it is
17 attached.

18 Q. The side is attached?

19 A. Yeah.

20 MS. JOSELSON: Slow down for Beth.

21 BY MR. LAFATA:

22 Q. Do you garden on your property?

23 A. We didn't last year because we were concerned
24 with PFOA in the soil.

25 Q. What about before that?

1 A. Yes, we did.

2 Q. What did you garden?

3 A. Tomatoes, asparagus, potatoes, carrots.

4 Q. Anything else?

5 A. It wasn't -- anything my husband had the urge
6 to try.

7 Q. And did you eat the fruit and vegetables in
8 your garden?

9 A. Yes.

10 Q. Do you have any flower gardens?

11 A. Yes.

12 Q. How many flower gardens do you have?

13 A. Three.

14 Q. Where are they located?

15 A. One is in the front lawn quite close to the
16 road; the other is in the front of our house
17 next to the house; and the other one is around
18 where the well was built.

19 Q. Do you ever raise any animals for consumption
20 on your land?

21 A. No.

22 Q. Do you have any animals on your land?

23 A. Two cats.

24 Q. Are they inside cats or outdoor?

25 A. Inside.

1 Q. How would you characterize the soil in your
2 land?

3 MS. JOSELSON: Object to the form. You
4 can answer it if you understand it.

5 A. I really don't know.

6 BY MR. LAFATA:

7 Q. Is there clay in your land, in your soil?

8 A. I don't know. I know the grass grows well.

9 Q. Is there sand in your soil?

10 A. I don't know.

11 Q. Is your soil rocky?

12 A. No.

13 Q. What type of foundation does your house sit
14 on?

15 A. Cement.

16 Q. How deep does the cement foundation go?

17 A. I don't know.

18 Q. Do you have a driveway to your garage?

19 A. Yes.

20 Q. Is it a paved driveway?

21 A. No.

22 Q. What is the nature of the driveway?

23 A. Gravel.

24 Q. Do you have a basement?

25 A. No. It's a split level, and the basement is

1 furnished, and we have bedrooms down there.

2 Q. Got it.

3 Are there any power or sewer lines buried
4 in your property?

5 A. Sewer.

6 Q. Are there any power lines buried on your
7 property?

8 A. Not to my knowledge.

9 Q. Is the power connection above ground?

10 A. Yes.

11 Q. Okay. When was the last time you replaced the
12 roof on your property?

13 A. I believe it was in the '90s.

14 Q. What was the roof before you replaced it?

15 A. Shingled.

16 Q. What did you replace it with?

17 A. Shingle.

18 Q. Why did you replace the roof?

19 A. Age.

20 Q. Was it leaking when you replaced it?

21 A. No.

22 Q. Was it damaged when you replaced it?

23 A. Some shingles were missing.

24 Q. Do you have siding on your house?

25 A. Wood.

1 Q. Have you ever replaced the siding?

2 A. No.

3 Q. Is your house, the exterior, painted?

4 A. Yes.

5 Q. When was the last time it was painted?

6 A. My husband has kind of done it in increments,
7 so I know he did some two or three years ago.
8 You know, like he does what's needed. So it's
9 ongoing basically.

10 Q. Do you know how much you've cost -- or how
11 much you've -- let me rephrase that -- how
12 much you've spent to paint the house?

13 A. Just the cost of the paint because he does the
14 work himself.

15 Q. Do you store the extra paint in your garage?

16 A. Yes.

17 Q. How much did you pay to replace the roof?

18 A. I would have to give you an estimate.

19 Q. What is your estimate?

20 A. About 3,000.

21 Q. Okay. Do you ever make any upgrades to the
22 landscaping?

23 A. Yes.

24 Q. What have you had done?

25 A. Well, my husband does everything himself. But

1 when we moved there, trees had fallen and then
2 left, and grass had actually grown over it, so
3 my husband dug all that up, and he put in --
4 planted grass. He cleaned up a lot of the,
5 you know, wild weeds that had grown up and
6 made a little more lawn. He put in the flower
7 gardens.

8 Q. So was most of that when you first moved into
9 the house?

10 A. Yes.

11 Q. Since then, have there been any major changes
12 to the landscaping?

13 A. No.

14 Q. Regular maintenance?

15 A. (Nod) .

16 Q. Is there a pool on your property?

17 A. Yes.

18 Q. Where is the pool?

19 A. Off the back deck. It actually has its own
20 deck. We have two decks.

21 Q. And how deep is the pool?

22 A. Four, four and a half feet. It's aboveground.

23 Q. Where is the pool equipment?

24 A. In the garage.

25 Q. And do you maintain the pool yourself or you

1 hire someone?

2 A. My husband does.

3 Q. He takes care of the pool chemistry?

4 A. Yes.

5 Q. Do you use your pool?

6 A. Yes.

7 Q. Is there a spa or Jacuzzi on your property?

8 A. No.

9 Q. Do you recall how much you spent on your new
10 windows?

11 A. Once again, it would be an estimate. I know
12 my brother and my husband put them in because
13 my brother is a contractor. So all we did was
14 buy the windows, but they were still a couple
15 thousand maybe. I don't know. They were
16 thousands.

17 Q. Do you remember the brand of the windows?

18 A. I don't.

19 Q. Have you ever done any remodeling inside the
20 house?

21 A. Yes.

22 Q. What did you have remodeled?

23 A. Bookshelves, both bathrooms, one of the
24 bedrooms downstairs closets were built,
25 bookshelves were built, and paper and

1 painting.

2 Q. Was there ever a time when there was
3 remodelling work done in the kitchen?

4 A. New countertops.

5 Q. When were the countertops changed?

6 A. I think the late '80s.

7 Q. What are the countertops in the kitchen? Are
8 they stone or are they vinyl -- what --

9 A. Formica maybe.

10 Q. You ever changed the flooring in your house?

11 A. No. We put new carpet downstairs.

12 Q. Where else is there carpet in your house?

13 A. Nowhere. Just the bedrooms downstairs.

14 Q. The bedrooms downstairs?

15 A. (Nod) .

16 Q. What is the flooring in the rest of the house?

17 A. Hardwood.

18 Q. Have you ever refinished your hardwood floors?

19 A. No.

20 Q. Do you shampoo your carpet?

21 A. No.

22 Q. Have you made any changes to the plumbing
23 system in your house?

24 A. Just to install a new dishwasher. I think
25 they had to change some pipes.

1 Q. When did you install a new dishwasher?

2 A. Within the last year.

3 Q. What kind of dishwasher did you buy last year?

4 A. Frigidaire.

5 Q. Any other major appliances -- we talked about
6 the furnace and the dishwasher -- that you had
7 changed?

8 A. We have been there over 30 years, so we've had
9 a new refrigerator, a new stove -- cook --
10 wood -- cook stove. That's all I recall.

11 MR. LAFATA: Mark this please.

12 (Deposition Exhibit No. 12 was marked for
13 identification.)

14 BY MR. LAFATA:

15 Q. Ms. Crawford, do you see Exhibit 11 in front
16 of you?

17 A. No.

18 MS. JOELSON: I think it's 12.

19 MR. LAFATA: Oh, thank you.

20 BY MR. LAFATA:

21 Q. 12?

22 A. Yes.

23 Q. Would you mind keeping the clip on it just so
24 we don't lose --

25 A. Oh, I am sorry.

1 Q. -- the order? That's all right.

2 A. I thought you were going to --

3 Q. Do you recognize the picture here?

4 A. Yes.

5 Q. Whose home is this?

6 A. Mine.

7 Q. And did you take these pictures?

8 A. No.

9 Q. Who took them?

10 A. My husband.

11 Q. Okay. What is shown in this first picture?

12 A. A portion of my kitchen.

13 Q. Do you know when these pictures were taken?

14 A. Within the last three months.

15 Q. Oh, so your kitchen looks this way today?

16 A. Yes.

17 Q. You mentioned that you had a new stovetop put
18 in. Is this the new stovetop here?

19 A. The whole stove.

20 Q. It's electric?

21 A. Yes.

22 Q. Did you ever have the cabinetry in your
23 kitchen changed while you lived there?

24 A. No.

25 Q. Did you ever have the kitchen repainted?

1 A. Yes.

2 Q. How many times has it been repainted?

3 A. Once.

4 Q. Was the tile and the back splash there when
5 you moved in?

6 A. Yes.

7 Q. And these are the new countertops you
8 mentioned, right?

9 A. Yes.

10 Q. Would you turn to the next page, please? Turn
11 to the next page, please?

12 Is this also your kitchen?

13 A. Yes.

14 Q. Was there ever a time you changed the kitchen
15 sink?

16 A. No. No.

17 Q. This is the original kitchen sink?

18 A. Mm-hmm.

19 Q. Okay. This is the new dishwasher here?

20 A. Mm-hmm. Yes.

21 Q. What is the flooring in the kitchen?

22 A. Linoleum.

23 Q. Did you ever change the flooring in your
24 kitchen?

25 A. No.

1 Q. This is the original flooring?

2 A. (Nod).

3 Q. Would you please turn to the next page?

4 This is the same kitchen, right?

5 A. Yes.

6 Q. Would you turn to the next page, please?

7 Sorry.

8 Same kitchen?

9 A. Yes.

10 Q. What is the door there on the left, the narrow
11 one?

12 A. A little pantry.

13 Q. Was that there when you moved in?

14 A. Yes.

15 Q. Was the wallpaper original or was that added?

16 A. Added.

17 Q. In the kitchen?

18 A. Yes.

19 Q. When did you add the wallpaper?

20 A. Probably five years after we moved in, so
21 1990.

22 Q. I also see some wallpaper in the hallway
23 there.

24 Was that there when you moved in?

25 A. No.

1 Q. When did you add that wallpaper?

2 A. Early '90s.

3 Q. Would you please turn to the next page?

4 What does this picture show?

5 A. My bedroom.

6 Q. Is this on the upper level of your house?

7 A. Yes.

8 Q. This is the hardwood flooring in your house?

9 A. Yes.

10 Q. When you mentioned you had bookshelves
11 installed, are these the bookshelves you were
12 referring to?

13 A. No. Obviously we need more.

14 Q. Is this window in your bedroom one of the new
15 windows you had installed?

16 A. Yes.

17 Q. Did you also have new window treatments
18 installed?

19 A. Yes.

20 Q. Would you please turn to the next page?

21 What room is this?

22 A. The office. It's one of the bedrooms. We use
23 it for an office.

24 Q. Is this on the same floor as the master
25 bedroom?

1 A. Yes.

2 Q. Was the wallpaper in the office original or
3 was that new?

4 A. New.

5 Q. What about for your bedroom?

6 A. New.

7 Q. Do you use your office for work?

8 A. No.

9 Q. Who uses it?

10 A. We just use it, computer.

11 Q. If you turn the page, please?

12 What bedroom is this?

13 A. This is an extra bedroom that we just use for
14 guests. It's upstairs.

15 Q. And is the flooring here original?

16 A. The flooring?

17 Q. Mm-hmm.

18 A. Yes.

19 Q. Is the wall painted?

20 A. Yes.

21 Q. Has it ever been repainted?

22 A. Yes.

23 Q. How many times has it been repainted?

24 A. Twice.

25 Q. When was the most recent time?

1 A. Probably '95, '96.

2 Q. All right. Would you turn the page, please?

3 Where in your house is this photograph
4 taken?

5 A. This was in that same extra bedroom.

6 Q. Are these the built-in bookshelves you
7 referred to earlier?

8 A. Yes.

9 Q. So these are built into the wall?

10 A. Mm-hmm. Yes.

11 Q. If you turn the page, please?

12 Is this the same bedroom?

13 A. Yes.

14 Q. Is that on the left the closet to the bedroom?

15 A. Yes.

16 Q. If you turn the page, please?

17 Where is this in your house?

18 A. It's downstairs.

19 Q. What is the purpose of this room?

20 A. That's the family room for my daughter and her
21 friends.

22 Q. Looks like a game here on the left?

23 A. Yes.

24 Q. What is the flooring in the downstairs area
25 here?

1 A. Carpet.

2 Q. And is there wallpaper on the left wall?

3 A. Yes.

4 Q. And the is right wall wallpaper or painted?

5 A. That's wallpaper also. Just it doesn't show
6 well.

7 Q. How recently was the wallpaper in this room
8 installed?

9 A. Late '90s.

10 Q. Would you turn the page, please?

11 Is this the same room?

12 A. Yes, it is.

13 Q. I see that game table on the far right side?

14 A. Yes.

15 Q. Okay. Is there an appliance on the right-hand
16 side behind the chair?

17 A. Dehumidifier.

18 Q. Does that service the downstairs area or the
19 whole house?

20 A. Just that room.

21 Q. Is the appliance on the bottom left just an
22 area heater, by the globe?

23 A. No, that's the dehumidifier.

24 Q. Oh, excuse me.

25 On the right-hand side behind the chair,

1 what is that large white thing against the
2 wall?

3 A. A freezer.

4 Q. Okay. Is the bookshelf here built into the
5 wall?

6 A. Yes.

7 Q. If you turn the page, please? One more time.
8 Is this the same room we were just
9 looking at?

10 A. Yes.

11 Q. Okay. Turn the page, please?

12 Where is this room in your house?

13 A. It's the downstairs bedroom.

14 Q. And when was the wallpaper here installed?

15 A. Early '90s.

16 Q. Is it carpeted?

17 A. Yes.

18 Q. When was that carpeting installed?

19 A. The same time as the paper also. In the '90s.

20 Q. Would you turn the page, please?

21 Is this the same bedroom?

22 A. Yes.

23 Q. What is the appliance on the floor there on
24 the left?

25 A. It's another dehumidifier.

1 Q. Do you have air conditioning in your house?

2 A. No.

3 Q. If you turn the page, please?

4 Is this a bathroom?

5 A. Yes.

6 Q. Where is this bathroom?

7 A. Downstairs.

8 Q. What is the flooring in the downstairs
9 bathroom?

10 A. Carpet.

11 Q. When was this carpet installed?

12 A. It was all put in at the same time. About
13 five or six years ago.

14 Q. And are the walls here painted?

15 A. Yes.

16 Q. Have you ever made any changes to the
17 appliances in this bathroom, the toilet, the
18 sink, the shower?

19 A. The shower and the sink.

20 Q. What was done to the sink?

21 A. Totally replaced.

22 Q. When did you do that?

23 A. Oh, boy. I don't recall.

24 Q. What was done to the shower?

25 A. Hmm?

1 Q. What was done to the shower?

2 A. Replaced.

3 Q. When did you replace the shower?

4 A. The same time we did the sink. I don't recall
5 exactly.

6 Q. Is this an outside facing window on the wall?

7 A. Yes.

8 Q. So this is a new window?

9 A. Yes.

10 Q. If you turn the page, please?

11 Is this the same bathroom?

12 A. Yes.

13 Q. Is that the sink you were referring to
14 earlier?

15 A. Yes.

16 Q. Do you recall when this wall was painted in
17 this bathroom?

18 A. I don't recall exactly.

19 Q. Was it within the last ten years?

20 A. I believe so.

21 Q. Would you turn the page, please?

22 Where is this in your house?

23 A. That is where our furnace is, washer and
24 dryer, water softener.

25 Q. So on the left-hand side there is a rounded

1 object. What is that?

2 A. That's a wood furnace that we don't use.

3 Q. When was last time you used it?

4 A. It's been over 20 years.

5 MS. JOSELSON: This?

6 THE WITNESS: Mm-hmm.

7 BY MR. LAFATA:

8 Q. On the -- in the center of the photo, there is
9 a large appliance. Is that a washing machine?

10 A. Yes.

11 Q. How old is the washing machine?

12 A. About five years.

13 Q. And what's the appliance to the left of that,
14 the large white one?

15 A. The water softener.

16 Q. How old is that?

17 A. I don't recall.

18 Q. On the far right-hand side, there is a bucket.
19 It's on the ground.

20 Do you know what those are?

21 A. I think my husband used those like to water
22 the garden. Things like that.

23 Q. What do you mean by watering the garden with
24 the buckets?

25 A. Well, there is a water tank in here, and he

1 would fill up the buckets and go up the
2 hatchway, and if we hadn't had rain, he would
3 water the garden.

4 Q. I see. Rather than a hose?

5 A. Yes.

6 Q. Okay. Where would he fill up the water to
7 water the garden?

8 A. On the next page, there is a -- do you see
9 blue on the left hand --

10 Q. A pipe?

11 A. There is a pipe, and then there is a blue
12 water tank.

13 Q. Yes.

14 A. He would take the water from that.

15 Q. Okay.

16 A. It's just a small tank, that makes it so when
17 you turn on the water faucet you don't have to
18 wait.

19 Q. So this blue tank is -- stores water?

20 A. Yeah.

21 Q. Okay. On the top of the page that you turned
22 to, there is some ductwork.

23 Do you see that at the top?

24 A. Mm-hmm.

25 Q. Is that for your heater?

1 A. I don't really know.

2 Q. Okay. There is an appliance in the middle of
3 the picture. Is that a dryer?

4 A. Yes.

5 Q. How old is the dryer?

6 A. Probably 15 years.

7 Q. And the floor in this part of the basement is
8 concrete?

9 A. Yes.

10 Q. There is a panel on the wall above the dryer.
11 Do you see that?

12 A. Yes.

13 Q. Do you know what panel that is?

14 A. That's the fuse box -- or the electrical box
15 with the -- what do you call -- not fuses but
16 the other thing.

17 Q. Okay. Above the dryer there is a silver pipe
18 that goes into the wall. Do you see that?

19 A. Yes.

20 Q. Does that go outside?

21 A. Yes.

22 Q. Do you see there is a fan to the left of the
23 dryer, an upright fan?

24 A. Yes.

25 Q. And to the left of that, is it a trash can?

1 A. Yes.

2 Q. Do you know what the bucket is below that?

3 A. Just an empty bucket.

4 Q. Okay. Would you please turn to the next page?

5 Where in your house is this picture?

6 A. Little dining nook.

7 Q. Is this where you eat?

8 A. Yes.

9 Q. And the back door there, does that go to the
10 backyard?

11 A. Yes.

12 Q. There's a porch out there?

13 A. A deck.

14 Q. What is the deck made out of?

15 A. Wood.

16 Q. When was the last time the deck had been
17 replaced?

18 A. It's the original deck we built like 33 years
19 ago.

20 Q. Is there a need to sand it or oil it or
21 anything like that, maintain it?

22 A. No.

23 Q. Is this flooring, the wood flooring, original
24 here?

25 A. Yes.

1 Q. There is a light fixture on the ceiling,
2 right?

3 A. Yes.

4 Q. Was that also original?

5 A. Yes.

6 Q. Are the doors to the back deck original?

7 A. No.

8 Q. When were those put in?

9 A. 1985.

10 Q. Would you please turn the page?

11 Is this the master bedroom again?

12 A. Yes.

13 Q. Would you please turn the page again?

14 Is this the second bathroom?

15 A. Yes.

16 Q. Where in your house is this bathroom located?

17 A. Right outside there is a door to our bedroom
18 and a door to the hallway.

19 Q. This bathroom has two doors?

20 A. Yes.

21 Q. Okay. And have you done any remodeling work
22 to this bathroom here?

23 A. Well, he took it to the studs, took everything
24 off and redid the whole thing.

25 Q. Is this Ted, your husband?

1 A. Mm-hmm.

2 Q. Did he replace the sink here with -- did he
3 replace the sink?

4 A. Yes.

5 Q. Did he replace the flooring?

6 A. Yes.

7 Q. What is the current flooring there?

8 A. Linoleum.

9 Q. Did he replace the shower?

10 A. Yes.

11 Q. Did he replace the toilet?

12 A. Yes.

13 Q. Do you remember when he did this work?

14 A. I don't recall. He is always doing something.

15 Q. Would you please turn to the next page?

16 Is this another picture of your dining
17 area?

18 A. Mm-hmm.

19 Q. Okay. If you turn to the next page, please?

20 Is this your kitchen?

21 A. Yes.

22 Q. All right. The next page, please?

23 Where in your house is this picture?

24 A. Upstairs.

25 Q. And what room is this?

1 A. Living room.

2 Q. Would you turn the page, please?

3 Is this the hallway in your house?

4 A. Yes.

5 Q. This was the wallpaper we talked about earlier
6 through the kitchen, right?

7 A. Mm-hmm.

8 Q. What is the door at the end of the hallway?

9 A. Closet.

10 Q. Is the wood framing around the doors in your
11 house, are those original too?

12 A. Yes.

13 Q. If you turn the page, please?

14 Is this the upstairs sitting area?

15 A. Yes.

16 Q. Were these bookshelves added to the house
17 behind the couch?

18 A. Yes.

19 Q. Do you know what the left of the bookshelf
20 behind the couch, what that pipe is from the
21 floor to the ceiling?

22 A. Oh, that was my mother's pole lamp, and when
23 she died -- it's from like the 1950s.

24 Q. So it detaches?

25 A. Yeah.

1 Q. If you turn the page, please?

2 What room is this?

3 A. This is the downstairs bedroom.

4 Q. This is carpeted?

5 A. Yes.

6 Q. Is the wallpaper original or was that added?

7 A. Added.

8 Q. This is the last picture in this set, right?

9 A. Yes.

10 (Deposition Exhibit No. 13 was marked for
11 identification.)

12 Q. Mrs. Crawford, do you have a copy of
13 Exhibit 13 in front of you?

14 A. Yes.

15 Q. And do you see at the top, in the middle and
16 toward the top, it says, Declaration of Linda
17 Crawford in Support of Plaintiffs' Motion for
18 Class Classification?

19 A. Yes.

20 Q. Would you turn with me to the last page?

21 And whose signature is on this page?

22 A. That's mine.

23 Q. Okay. Do you remember reading this when you
24 signed it?

25 A. Yes.

1 Q. Would you turn with me to the first page?

2 Do you see the first paragraph there,
3 number one?

4 A. Yes.

5 Q. And the second sentence, do you see: I have
6 personal knowledge of the statements contained
7 in this declaration, and if called to testify,
8 I could and would testify competently to them.

9 Do you see that?

10 A. Yes.

11 Q. That is true, right?

12 A. Right.

13 Q. Would you turn with me to the second page?

14 In paragraph eight, do you see that
15 number?

16 A. Yes.

17 Q. It starts out: We have a low level of PFOA in
18 our well as of last test. We have a big
19 investment in our well.

20 Do you see that?

21 A. Yes.

22 Q. And when you refer to a big investment, what
23 are you referring to in your well?

24 A. The thousands of dollar we paid to get a new
25 pump, submersible pump, and have it drilled

1 further down.

2 Q. How much was paid to drill, aside from the
3 pump, to drill?

4 A. I don't know what was what. It was just one
5 bill.

6 Q. Do you know what the total bill was?

7 A. I don't. Thousands of dollars.

8 Q. Do you have a copy of the bill?

9 A. I do.

10 Q. Would you be willing to provide a copy of the
11 bill?

12 A. Yes.

13 Q. Okay.

14 A. My hus -- can I just say that my husband is
15 coming in next week. Can he bring it then?

16 Q. Sure.

17 A. Okay.

18 Q. Thank you for that.

19 In the next sentence, do you see it says:
20 We had the option to connect to municipal
21 water in the past as a waterline is in place
22 in front of our house? Do you see that?

23 A. Yes.

24 Q. What did you mean when you wrote the waterline
25 is in place in front of your house?

1 A. A few years ago they extended the waterline,
2 and when it first went by our house we
3 couldn't hook on because they had gotten a
4 grant for I believe a farm that was up the
5 road or not -- it's not an operating farm.
6 It's a -- they hold receptions and whatever.

7 And then we could get on it, but we
8 didn't want to because our water is fresh and
9 pure and clean and no chemicals, so -- and we
10 didn't want to pay the quarterly bill, so --

11 Q. So there is a hookup, at least for your house,
12 that is available, right?

13 A. Yeah, there's a hydrant right in my front
14 yard.

15 Q. A fire hydrant?

16 A. (Nod.

17 Q. In paragraph 9 you write: As a result of the
18 contamination of the groundwater beneath my
19 property, as well as my property and soils,
20 with PFOA, I have suffered damages, including,
21 but not limited to, real property damage.

22 Do you see that?

23 A. Yes.

24 Q. Diminution of property value. Do you see
25 that?

1 A. Yes.

2 Q. Loss of use and enjoyment of property,
3 annoyance, upset, aggravation, and
4 inconvenience.

5 Do you see that?

6 A. Yes.

7 Q. When you refer here to real property damage,
8 what do you mean?

9 A. I mean that my house is not worth what it was.

10 Q. Do you mean anything else?

11 A. Well, they are going to have to dig up my
12 front yard to put the water in.

13 Q. Anything else?

14 A. A lot of activity in our neighborhood, trucks
15 and whatever putting water lines in, but
16 that -- yes. That hasn't damaged my house but
17 it's aggravating.

18 Q. And do you mean anything else by real property
19 damage?

20 A. Not that I know, except that my soil is
21 contaminated.

22 Q. Does that cover it all for real property
23 damage?

24 A. The -- if they bury my well, they're going to
25 have to dig up that. That's going be a mess

1 right in my -- right off my deck.

2 Q. Did someone tell you that someone -- would
3 need to bury your well?

4 A. Yes.

5 Q. And who said that?

6 A. I think one of the men from the State of
7 Vermont, one of the departments, that --
8 because we asked, can we keep our well open so
9 that we could use that for drinking water.
10 And they said, no, that has to be totally
11 filled in, the pump taken out and then totally
12 filled in.

13 Q. Is there any other real property damage that
14 you refer to here that you haven't told me?

15 A. Not that I can recall right now.

16 Q. Diminution of property value. We talked about
17 that, right?

18 A. Mm-hmm.

19 Q. What has been the diminution of property value
20 for your house?

21 A. Well -- you mean money, numbers?

22 Q. Sure.

23 A. Well, we always thought we would probably sell
24 it for, you know, 185 to 200, and now it's
25 probably 140 to 155.

1 Q. And the next section says loss of use and
2 enjoyment of property.

3 Do you see that?

4 A. Mm-hmm.

5 Q. What do you mean by that?

6 A. We don't feel free to grow our own vegetables
7 anymore because we don't know about the soil,
8 and it's just -- just awful knowing that, you
9 know, underneath your house, your property,
10 there is poison. Sometimes I sit on the deck
11 and I -- I just don't feel safe. I just --
12 it's not the same.

13 Q. Other than the vegetable garden, are there
14 other things that you used to do on your
15 property that you are no longer able to do?

16 A. We don't fill our pool with our well water.

17 Q. What do you fill it with?

18 A. We have to pay the town 100 -- I believe \$150
19 to use the hydrant.

20 Q. Anything else?

21 A. Not that I can think of right now.

22 Q. You mention here annoyance, upset,
23 aggravation, and inconvenience.

24 What do you mean by that?

25 A. I mean, I got really angry when I learned that

1 my well was polluted, and it's upsetting that
2 you have to change your way of living actually
3 because of this poison that I didn't ask for
4 and I don't want.

5 And annoyance and aggravation, that was
6 all the work that's going on in my
7 neighborhood to put these new waterlines in.
8 I opened my windows yesterday because it was
9 nice, and my house was just full of dust.
10 There's dust everywhere from all the trucks.
11 A lot of truck traffic, people coming to your
12 door because they want to check out where they
13 are going to put the lines. It's kind of
14 aggravating.

15 Q. Would you turn the page, please?

16 In paragraph 11, do you see that?

17 A. Yes.

18 Q. It says: I have no known conflicts with other
19 members of the proposed class.

20 What do you mean by that?

21 A. I have -- you know, I am not -- I don't have a
22 bad relationship with anybody. I am not angry
23 at anybody. I just want to help everybody,
24 and that includes all these members of the
25 class.

1 Q. In paragraph 15, do you see that below?

2 A. Yes.

3 Q. You say I am not pursuing individual or
4 class-wide claims against the defendant for
5 psychiatric or psychological injury.

6 Do you see that?

7 A. Yes.

8 Q. Is that true?

9 A. To the best of my knowledge, yes.

10 Q. Okay.

11 MR. LAFATA: Good time for a break?

12 MS. JOSELSON: I was going to say it's
13 been about an hour.

14 THE VIDEOGRAPHER: At 1:50 p.m. we're
15 going off the record and we are concluding
16 media unit number two of our deposition. We
17 are off the record.

18 (Brief recess taken.)

19 (Deposition Exhibit No. 14 was marked for
20 identification.)

21 THE VIDEOGRAPHER: At 2:06 p.m. we are
22 coming back on the record. Now beginning
23 media unit number three of our deposition with
24 Linda Crawford. We are on the record.

25 BY MR. LAFATA:

1 Q. Ms. Crawford, do you recall whether your home
2 has ever been appraised?

3 A. Yes, it has.

4 Q. How many times has the value of your house
5 been appraised?

6 A. Four.

7 Q. When was the first time it was appraised?

8 A. '85.

9 Q. Was that in connection with the original
10 purchase?

11 A. No. They just happened to -- we were in the
12 zone to be reappraised at that point.

13 Q. Was this something the state did?

14 A. No, the town. They don't do the whole town
15 all at once. I believe they do it in
16 sections, different times.

17 Q. And after the appraisal in 1985, what was the
18 next time it was appraised, if you remember?

19 A. '99.

20 Q. Who performed that appraisal?

21 A. The town.

22 Q. And after that?

23 A. '04.

24 Q. And when was the most recent time it was
25 appraised?

1 A. Well, I think I made an error. In '08, we
2 refinanced again, and they just accepted the
3 '04 assessment. So it was actually done three
4 times. But I believe we have four documents,
5 but they took the '04 appraisal for the '08
6 appraisal.

7 Q. Understood. So then the most recent time
8 someone had appraised your house was 2004; is
9 that correct?

10 A. Yes.

11 Q. Who performed the 2004 appraisal?

12 A. I don't know. They were different people. I
13 don't recall exactly who it was.

14 Q. In the 1985 appraisal, do you know what the
15 appraised value was?

16 A. 61,5.

17 Q. And in the 1999 appraisal, do you know what
18 the appraised value was?

19 A. 99.

20 Q. What about in the 2004 appraisal?

21 A. 148.

22 Q. And I am understanding 99 and 148 to be
23 thousands, right?

24 A. Yes.

25 Q. Okay. I am handing you a copy of exhibit 14.

1 At the top do you see it says Uniform
2 Residential Appraisal Report?

3 A. Mm-hmm. Yes.

4 Q. Would you turn to the next page?

5 Do you see there is, on the bottom, a
6 date of November 3, 1992? Do you see that?

7 A. Yes.

8 Q. And it was signed by David Buckley.

9 Do you see that?

10 A. Yes.

11 Q. Do you remember David Buckley?

12 A. I remember he was one of the ones that did an
13 appraisal. I didn't know which one.

14 Q. For this 1992 appraisal, do you see it's
15 \$99,000?

16 A. Mm-hmm. Yes.

17 Q. Do you have any reason to disagree with the
18 appraisal in 1992?

19 A. No.

20 (Deposition Exhibit No. 15 was marked for
21 identification.)

22 Q. Ms. Crawford, do you see Exhibit 15 in front
23 of you?

24 A. Yes.

25 Q. And do you see on the first page there's a

1 date of February 5, 2004? On the cover page.

2 A. Yes.

3 Q. And it says this is for the Bank of
4 Bennington.

5 Do you see that?

6 A. Yes.

7 Q. Was this in connection with any financial
8 transaction with your house?

9 A. The re -- re-mortgaging.

10 Q. Okay. And this was by Richard Goodfellow.

11 Do you see that?

12 A. Yes.

13 Q. Do you remember Richard Goodfellow?

14 A. I don't remember him. I remember the name.

15 Q. Would you turn to -- on the bottom right it
16 says 23?

17 A. Yes.

18 Q. At the top do you see it says Uniform
19 Residential Appraisal Report?

20 A. Yes.

21 Q. On the bottom there, do you see there is a
22 typed line that says -- do you see since the
23 subject was built? Do you see that?

24 A. Yes.

25 Q. Since the subject was built prior to 1978,

1 there may be lead paint present. This is
2 typical and has not affected single family
3 home values.

4 Do you see that?

5 A. Yes.

6 Q. Have you ever had any paint test in your house
7 for lead?

8 A. No.

9 Q. Would you turn to the next page, please?

10 Do you see at this bottom there there is
11 an appraisal date of February 5, 2004?

12 A. Yes.

13 Q. Okay. And then beneath that, do you see the
14 appraisal value of \$148,000? Do you see that?

15 A. Yes.

16 Q. Do you have any reason to disagree with the
17 appraisal from 2004 of 148,000?

18 A. No.

19 Q. Would you turn please to page 26 of this
20 document?

21 Do you see a diagram on the top?

22 A. Yes.

23 Q. Have you -- look over this diagram. Does this
24 appear to you to be an accurate diagram of
25 your house, the layout?

1 A. It doesn't have the second deck on it.

2 Q. Where is the second deck to your house?

3 A. The pool is here and the deck -- there is
4 steps going down this deck to the pool, the
5 deck by the pool. It's right in here.

6 Q. Let me try to clarify it for the record.

7 You are pointing to the left of where the
8 document says deck; is that right?

9 A. Yes.

10 Q. That is a location of where your pool is,
11 about?

12 A. Yes.

13 Q. And you said there's an additional deck around
14 the pool or near the pool?

15 A. Near the pool.

16 Q. Okay. Is that deck connected to your house,
17 the pool deck?

18 A. By this deck. There's steps that go -- it's
19 lower; it's a lower deck.

20 Q. Understood. Is the lower deck on the ground?

21 A. Yes.

22 Q. Okay. Is that also a wooden deck?

23 A. Yes.

24 Q. Are there any other parts of this diagram that
25 appear to be inaccurate to you, or is this

1 otherwise okay?

2 A. It looks okay.

3 Q. So at the top there are three bedrooms, the
4 top level?

5 A. Yes.

6 Q. And one bath at the top?

7 A. Mm-hmm. Yes.

8 Q. And the bottom there are those two extra
9 bedrooms, right?

10 A. Yes.

11 Q. And the bath at the bottom?

12 A. Yes.

13 Q. Okay. Would you please turn to page 28 of
14 this document?

15 Do you see at the top it says subject,
16 photo page?

17 A. Yes.

18 Q. Are these photos of your house, the exterior?

19 A. Yes.

20 Q. And in the middle photo, I see there is --
21 there is a deck that is raised off the ground
22 correcting to the upper level.

23 Do you see that?

24 A. Yes.

25 Q. And then off to the right, is that -- is that

1 where that lower deck is?

2 A. Yes.

3 Q. Okay. Do you have a fireplace in your house?

4 A. No.

5 Q. What does the chimney connect to?

6 A. The oil furnace.

7 Q. Have you ever had the gutters changed in your
8 house?

9 A. Yes.

10 Q. When was the last time that was done?

11 A. I don't recall.

12 Q. Do you have any pictures of the outside of
13 your house besides these?

14 A. I don't believe so.

15 (Deposition Exhibit No. 16 was marked for
16 identification.)

17 Q. Mrs. Crawford, do you have a copy of
18 Exhibit 16 in front of you?

19 A. Yes.

20 Q. Do you see at the top it refers to change in
21 appraisal of real estate?

22 A. Yes.

23 Q. And do you see the date up there of June 5th,
24 2008?

25 A. Yes.

1 Q. And it's addressed to you and Ted, correct?

2 A. Correct.

3 Q. And this indicates in the middle that the
4 previous real value was assessed at \$122,600,
5 correct?

6 A. Correct.

7 Q. And that the new value is \$136,200, right?

8 A. Correct.

9 Q. So that was an increase in the appraised value
10 of the property in 2008, right?

11 A. Yes.

12 Q. And did that result in an increase in the tax
13 bill for the property?

14 A. Yes.

15 Q. In -- as of 2008 do you have any reason to
16 disagree with the value of the property being
17 \$136,200?

18 A. No.

19 (Deposition Exhibit No. 17 was marked for
20 identification.)

21 Q. Mrs. Crawford, you have been handed a copy of
22 Exhibit 17.

23 Do you see that?

24 A. Yes.

25 Q. This is a tax bill from the Town of

1 Bennington, correct?

2 A. Correct.

3 Q. And at the top it's dated March 13, 2017.

4 Do you see that?

5 A. Yes.

6 Q. And this covers the tax year 2016 to 2017,
7 correct?

8 A. Yes.

9 Q. This was mailed to you and your husband at
10 your home, right?

11 A. Yes.

12 Q. On the right-hand side, do you see the
13 appraised value, house site value, in that
14 box?

15 A. Yes.

16 Q. It says \$136,200, correct?

17 A. Correct.

18 Q. Do you have any reason in 2017 to disagree
19 with the assessed value of your property here?

20 A. No.

21 Q. Do you have homeowners insurance on your
22 property?

23 A. Yes.

24 Q. Who in your household decides how much
25 insurance to purchase for your property?

1 A. Let's see, I think my husband had the
2 conversation with the agent. So between the
3 two of them they came up with something.

4 Q. Who is your agent?

5 A. Hartford.

6 Q. Do you know the name of the agent?

7 A. No. We get it through AARP.

8 Q. AARP?

9 A. Yeah. So we deal with them directly if we
10 have an issue.

11 Q. Do you believe your house is fully insured?

12 A. Yes.

13 Q. So if there were say a fire that destroyed the
14 house, the insurance could pay to rebuild it?

15 A. I believe so.

16 Q. Do you pay your insurance premiums for your
17 homeowners insurance?

18 A. We do, yes.

19 Q. You ever tried to sell your house?

20 A. No.

21 Q. You ever tried to rent your house?

22 A. No.

23 Q. Do you have any plans to rent your house?

24 A. No.

25 Q. Do you have any plans to sell your house?

1 A. Nothing definite. My husband is going to
2 retire in 59 days, and we don't know what
3 we're going to do. We haven't made any real
4 plans.

5 Q. As of today you don't have a plan to sell the
6 house?

7 A. No.

8 Q. 59 days and counting, huh?

9 A. I've got something right on the refrigerator.

10 Q. Have you ever talked to a real estate agent
11 about the value of your house in the last ten
12 years?

13 A. No.

14 Q. Have you ever put your house on the market in
15 the last ten years?

16 A. No.

17 Q. You mentioned when your well pump was replaced
18 that there was a water quality test. Do you
19 recall that? Do you recall saying that?

20 A. I recall saying that. You know, I am sure
21 they did because I think that is common
22 practice, but I -- I don't know for sure.

23 Q. Other than that, do you recall any water ever
24 being tested prior to 2016 for any chemicals
25 in the water?

1 A. Not for chemicals, no.

2 Q. For anything else?

3 A. Periodically we would have it tested, but that
4 was before it was sealed because we feel very
5 confident that it was okay, but we would have
6 it tested for bacteria, and it was always all
7 right.

8 Q. Who would do the test for bacteria?

9 A. The department of health.

10 Q. Did they charge you for that test?

11 A. Yes.

12 Q. Have any of those tests resulted in any
13 finding of bacteria in the water?

14 A. No.

15 Q. Have you ever had your soil tested for
16 chemicals at your property?

17 A. No.

18 Q. Have you ever appraised a home yourself?

19 A. No.

20 Q. Do you have any real estate license?

21 A. No.

22 Q. Have you ever listed someone else's property
23 for sale before?

24 A. No.

25 Q. Do you have any experience valuing a property,

1 a residential property?

2 A. No.

3 Q. Have you ever performed any research into
4 residential property values before?

5 A. No.

6 Q. Do you live in a residential neighborhood?

7 A. Yes.

8 Q. Is there any commercial zone or business in
9 the area of your neighborhood?

10 A. No.

11 Q. Any --

12 A. No. There is a veterinarian's office but
13 it's -- it's up the road a ways. That's all.

14 Well, and there is a retail store across
15 the street.

16 Q. What is the retail store across the street?

17 A. Antiques.

18 Q. Antiques?

19 A. (Nod).

20 Q. Do you use the vet for your cats up the road?

21 A. Yes.

22 Q. Do you entertain socially at home?

23 A. Not very often.

24 Q. When was the last time you did that?

25 A. Thanksgiving.

1 Q. So around the holidays you will entertain?

2 A. Yes. Just family.

3 Q. Do you have any plans to change the
4 entertainment at your house around the
5 holidays?

6 A. No.

7 Q. Do you use your house for any commercial
8 activity?

9 A. No.

10 Q. So Mr. Crawford works outside the house,
11 correct?

12 A. Correct.

13 Q. For income?

14 A. Yes.

15 Q. And you have worked for income outside the
16 house?

17 A. (Nod) .

18 Q. Yes?

19 A. Yes.

20 Q. Does anyone use your land for sports?

21 A. No.

22 Q. After PFOA was detected in your water, did you
23 do anything to make any effort to remediate
24 the presence of PFOA in your water?

25 MS. JOELSON: Objection. You can

1 answer.

2 A. I wouldn't know how to begin.

3 BY MR. LAFATA:

4 Q. Is that a no?

5 A. That's a no.

6 Q. What about with the soil, have you taken any
7 steps to remediate any of your soil?

8 A. No.

9 Q. Did you live at your home at the time that
10 ChemFab's business was operating on Water
11 Street?

12 A. Yes.

13 Q. Did you ever go to the facility?

14 A. No.

15 Q. Do you remember the facility in particular?

16 MS. JOSELSON: Object to the form. You
17 can answer it.

18 A. Yes.

19 BY MR. LAFATA:

20 Q. Were you aware it was there when it was open?

21 A. Open? Oh, when it was operating?

22 Q. Yes.

23 A. Yes.

24 Q. What, if anything, do you remember about it?

25 A. I remember a woman I worked with complaining

1 about how it smelt so bad because she lived
2 nearby.

3 Q. Did you smell anything from the facility where
4 you lived?

5 A. No.

6 Q. Did you ever meet or talk to anyone who worked
7 at ChemFab?

8 A. No.

9 Q. Do you know what business was done at that
10 ChemFab facility?

11 A. I understand they make Teflon, like for pots
12 and pans, and waterproof material.

13 Q. Anything else?

14 A. No.

15 Q. Did you live in your home at the time that the
16 ChemFab facility was open on Northside Drive?

17 A. No.

18 Q. Have you talked to any realtor about any
19 change in the value of your property due to
20 PFOA?

21 A. No.

22 Q. Have you talked to any appraiser about any
23 change in your property value due to the
24 presence of PFOA?

25 A. No.

Row	Bar Length (approx. % of total width)
1	100
2	95
3	45
4	65
5	15
6	90
7	55
8	95
9	45
10	40
11	55
12	20
13	60
14	10
15	100
16	50
17	20
18	90
19	35
20	55
21	85
22	10

23 Q. Do you personally or socially know any of the
24 other plaintiffs who are in this case?

25 A. Yes.

1 Q. Who do you know?

2 A. My neighbors on both sides of me, Lauren and
3 Donna.

4 Q. Do you have Exhibit 13 in front of you still?
5 That?

6 A. 13.

7 Q. Mm-hmm.

8 A. 12. 11, 1, 14.

9 Q. 13.

10 A. 13. Thank you.

11 MR. LAFATA: Thank you, Emily.

12 A. 13.

13 Q. Thank you, yes.

14 At the top there, do you see on the upper
15 left the name James Sullivan?

16 A. Yes.

17 Q. Do you know Jim Sullivan or Leslie Addison?

18 A. No.

19 Q. Do you know William Sumner?

20 A. No.

21 Q. Do you know Ronald Hausthor?

22 A. I don't know them. I know of them.

23 Q. Okay. What about Gordon Garrison?

24 A. No.

25 Q. Do you know Bill Knight?

1 A. No.

2 Q. Have you had any conversation with any of
3 those plaintiffs about this case?

4 MS. JOSELSON: You mean not associated
5 with counsel.

6 BY MR. LAFATA:

7 Q. Other than any --

8 A. No. No.

9 Q. Have you ever had any conversations with
10 anyone from Saint-Gobain about this case?

11 A. No.

12 Q. Have you ever met anyone from Saint-Gobain?

13 A. No.

14 Q. When was the first time you had heard the name
15 Saint-Gobain?

16 A. Well, when my coworker would complain about
17 it, but that's all. She would just come in
18 and say, oh, it smells so bad over there
19 today.

20 Q. In connection with the old plant operations
21 you mean?

22 A. The one on Water Street.

23 Q. Have you ever had any communications with any
24 members of state government agencies or
25 elected officials about PFOA or Saint-Gobain

1 or ChemFab?

2 MS. JOELSON: Object to the form, but
3 you can answer it.

4 A. Any conversations?

5 BY MR. LAFATA:

6 Q. Mm-hmm.

7 A. Only, you know, we went to the informational
8 meetings and met, you know, representatives of
9 the state government, but I didn't really have
10 a one-on-one conversation.

11 Q. Just sort of sat in a --

12 A. Sat in, and I did ask -- I asked a question
13 because that was when the zone of
14 contamination was still being expanded, and we
15 were really close. And he told me that --
16 that's when he told that what they were doing
17 was testing the wells until they got a number
18 of them negative, and we were next, that it
19 was -- it was still expanding, would include
20 us.

21 Q. That conversation happened in that meeting?

22 A. At that meeting just kind of with a whole
23 bunch of people and everybody was asking
24 questions.

25 Q. Was Mr. Crawford with you at the meeting?

2 Q. Have you ever had any other communications
3 with anyone with the state government about
4 PFOA or Saint-Gobain or this case?

6 Q. What about the federal government?

8 Q. Have you ever written any letters to an editor
9 about this case?

11 (Deposition Exhibit No. 18 was marked for
12 identification.)

Row	Bar Length (approx. %)
1	85
2	65
3	25
4	95
5	35
6	25
7	92
8	100
9	30
10	25
11	95
12	45

Category	Value (approximate percentage)
1	10
2	85
3	15
4	100
5	55
6	90
7	10
8	40
9	60
10	100
11	75
12	10

17 (Deposition Exhibit No. 19 was marked for
18 identification.)

A horizontal bar chart titled 'U.S. should take action to reduce greenhouse gas emissions' showing the percentage of respondents who believe the U.S. should take action to reduce greenhouse gas emissions, broken down by age group. The y-axis lists age groups: 18-29, 30-49, 50-69, 70+, and All. The x-axis represents the percentage from 0 to 100. The bars are dark blue. The data is as follows:

Age Group	Percentage
18-29	88%
30-49	72%
50-69	32%
70+	88%
All	72%

Row	Small Square	Large Square	Bar Length (approx. % of total width)
1	Yes	Yes	10
2	Yes	Yes	5
3	Yes	Yes	100
4	Yes	Yes	10
5	Yes	No	90
6	Yes	Yes	5
7	Yes	Yes	75
8	Yes	Yes	10
9	Yes	Yes	50
10	Yes	Yes	10
11	Yes	Yes	100
12	Yes	No	75
13	Yes	Yes	10
14	Yes	Yes	100
15	Yes	No	95
16	Yes	No	40
17	Yes	No	50
18	Yes	Yes	10
19	Yes	Yes	90
20	Yes	No	80
21	Yes	Yes	10
22	Yes	Yes	100
23	Yes	No	45
24	Yes	Yes	10

25 Q. Ms. Crawford, when you were employed at

1 Vermont Veterans' Home, how many days a week
2 did you work?

3 A. Five.

4 Q. And what were your hours?

5	A. Seven to 3:30.
---	-------------------

6 Q. Was that every day?

7	A. Yes.
---	---------

8 Q. Do you know the -- let me rephrase.

[illegible]

☐ ☐ ☐

25	A. Mm-hmm.
----	------------

1 Q. And your work at Southwest [sic] Vermont
2 Medical Center, right?

3 A. Yes.

4 Q. And your work at the Vermont Veterans' Home,
5 correct?

6 A. Correct.

7 Q. Have you ever been employed anywhere else?

8 A. No.

9 Q. Did you ever do nursing services in any
10 operation rooms?

11 A. No.

[REDACTED]

[illegible]

[illegible]

Row	Bar Length (approx. % of total width)
1	90
2	10
3	100
4	40
5	30, 60
6	55
7	10
8	85
9	10
10	80
11	10
12	50
13	10
14	85
15	15

Category	Sub-category	Value
Category 1	Sub-category 1.1	10
	Sub-category 1.2	90
	Sub-category 1.3	10
	Sub-category 1.4	10
	Sub-category 1.5	70
	Sub-category 1.6	40
	Sub-category 1.7	75
	Sub-category 1.8	10
	Sub-category 1.9	90
	Sub-category 1.10	10
Category 2	Sub-category 2.1	10
	Sub-category 2.2	70
	Sub-category 2.3	60
	Sub-category 2.4	10
	Sub-category 2.5	55
	Sub-category 2.6	35
	Sub-category 2.7	85
	Sub-category 2.8	50
	Sub-category 2.9	45
	Sub-category 2.10	100
Category 3	Sub-category 3.1	10
	Sub-category 3.2	60
	Sub-category 3.3	30
	Sub-category 3.4	90

[illegible]

Year	Country	Value
2000	United States	100
2001	United States	100
2002	United States	100
2003	United States	100
2004	United States	100
2005	United States	100
2006	United States	100
2007	United States	100
2008	United States	100
2009	United States	100
2010	United States	100
2011	United States	100
2012	United States	100
2013	United States	100
2014	United States	100
2015	United States	100
2016	United States	100
2017	United States	100
2018	United States	100
2019	United States	100
2020	United States	100
2021	United States	100
2022	United States	100
2023	United States	100
2024	United States	100
2025	United States	100
2026	United States	100
2027	United States	100
2028	United States	100
2029	United States	100
2030	United States	100
2031	United States	100
2032	United States	100
2033	United States	100
2034	United States	100
2035	United States	100
2036	United States	100
2037	United States	100
2038	United States	100
2039	United States	100
2040	United States	100
2041	United States	100
2042	United States	100
2043	United States	100
2044	United States	100
2045	United States	100
2046	United States	100
2047	United States	100
2048	United States	100
2049	United States	100
2050	United States	100
2051	United States	100
2052	United States	100
2053	United States	100
2054	United States	100
2055	United States	100
2056	United States	100
2057	United States	100
2058	United States	100
2059	United States	100
2060	United States	100
2061	United States	100
2062	United States	100
2063	United States	100
2064	United States	100
2065	United States	100
2066	United States	100
2067	United States	100
2068	United States	100
2069	United States	100
2070	United States	100
2071	United States	100
2072	United States	100
2073	United States	100
2074	United States	100
2075	United States	100
2076	United States	100
2077	United States	100
2078	United States	100
2079	United States	100
2080	United States	100
2081	United States	100
2082	United States	100
2083	United States	100
2084	United States	100
2085	United States	100
2086	United States	100
2087	United States	100
2088	United States	100
2089	United States	100
2090	United States	100
2091	United States	100
2092	United States	100
2093	United States	100
2094	United States	100
2095	United States	100
2096	United States	100
2097	United States	100
2098	United States	100
2099	United States	100

Year	Country	Value
1990	United States	100
1991	United States	100
1992	United States	100
1993	United States	100
1994	United States	100
1995	United States	100
1996	United States	100
1997	United States	100
1998	United States	100
1999	United States	100
2000	United States	100
2001	United States	100
2002	United States	100
2003	United States	100
2004	United States	100
2005	United States	100
2006	United States	100
2007	United States	100
2008	United States	100
2009	United States	100
2010	United States	100
2011	United States	100
2012	United States	100
2013	United States	100
2014	United States	100
2015	United States	100
2016	United States	100
2017	United States	100
2018	United States	100
2019	United States	100
2020	United States	100
2021	United States	100
2022	United States	100
2023	United States	100
2024	United States	100
2025	United States	100
2026	United States	100
2027	United States	100
2028	United States	100
2029	United States	100
2030	United States	100
2031	United States	100
2032	United States	100
2033	United States	100
2034	United States	100
2035	United States	100
2036	United States	100
2037	United States	100
2038	United States	100
2039	United States	100
2040	United States	100
2041	United States	100
2042	United States	100
2043	United States	100
2044	United States	100
2045	United States	100
2046	United States	100
2047	United States	100
2048	United States	100
2049	United States	100
2050	United States	100
2051	United States	100
2052	United States	100
2053	United States	100
2054	United States	100
2055	United States	100
2056	United States	100
2057	United States	100
2058	United States	100
2059	United States	100
2060	United States	100
2061	United States	100
2062	United States	100
2063	United States	100
2064	United States	100
2065	United States	100
2066	United States	100
2067	United States	100
2068	United States	100
2069	United States	100
2070	United States	100
2071	United States	100
2072	United States	100
2073	United States	100
2074	United States	100
2075	United States	100
2076	United States	100
2077	United States	100
2078	United States	100
2079	United States	100
2080	United States	100
2081	United States	100
2082	United States	100
2083	United States	100
2084	United States	100
2085	United States	100
2086	United States	100
2087	United States	100
2088	United States	100
2089	United States	100
2090	United States	100
2091	United States	100
2092	United States	100
2093	United States	100
2094	United States	100
2095	United States	100
2096	United States	100
2097	United States	100
2098	United States	100
2099	United States	100

[illegible]

Year	Country	Population (millions)	Population Growth (millions)	Population Growth (%)	Population Growth (millions)	Population Growth (%)
1950	United States	150	10	6.7	10	6.7
1950	France	45	2	4.4	2	4.4
1950	Germany	50	1	2.0	1	2.0
1950	Japan	80	1	1.2	1	1.2
1950	United Kingdom	55	1	1.8	1	1.8
1950	Italy	45	1	2.2	1	2.2
1950	Canada	25	1	4.0	1	4.0
1950	China	550	10	1.8	10	1.8
1950	India	350	10	2.9	10	2.9
1950	U.S.S.R.	160	10	6.3	10	6.3
1950	Latin America	250	10	4.0	10	4.0
1950	Sub-Saharan Africa	200	10	5.0	10	5.0
1950	North Africa	100	10	10.0	10	10.0
1950	Middle East	100	10	10.0	10	10.0
1950	Asia (excl. China)	300	10	3.3	10	3.3
1950	Europe (excl. U.K., U.S.S.R.)	200	10	5.0	10	5.0
1950	World	2500	100	4.0	100	4.0
1960	United States	160	10	6.3	10	6.3
1960	France	48	2	4.2	2	4.2
1960	Germany	52	1	1.9	1	1.9
1960	Japan	90	1	1.1	1	1.1
1960	United Kingdom	58	1	1.7	1	1.7
1960	Italy	48	1	2.1	1	2.1
1960	Canada	28	1	3.6	1	3.6
1960	China	600	10	1.7	10	1.7
1960	India	380	10	2.6	10	2.6
1960	U.S.S.R.	170	10	5.9	10	5.9
1960	Latin America	280	10	3.6	10	3.6
1960	Sub-Saharan Africa	220	10	4.5	10	4.5
1960	North Africa	110	10	9.1	10	9.1
1960	Middle East	110	10	9.1	10	9.1
1960	Asia (excl. China)	320	10	3.1	10	3.1
1960	Europe (excl. U.K., U.S.S.R.)	210	10	4.8	10	4.8
1960	World	2600	100	3.8	100	3.8
1970	United States	170	10	5.9	10	5.9
1970	France	50	2	4.0	2	4.0
1970	Germany	54	1	1.8	1	1.8
1970	Japan	100	1	1.0	1	1.0
1970	United Kingdom	60	1	1.7	1	1.7
1970	Italy	50	1	2.0	1	2.0
1970	Canada	30	1	3.3	1	3.3
1970	China	650	10	1.5	10	1.5
1970	India	400	10	2.5	10	2.5
1970	U.S.S.R.	180	10	5.6	10	5.6
1970	Latin America	310	10	3.2	10	3.2
1970	Sub-Saharan Africa	240	10	4.2	10	4.2
1970	North Africa	120	10	8.3	10	8.3
1970	Middle East	120	10	8.3	10	8.3
1970	Asia (excl. China)	340	10	2.9	10	2.9
1970	Europe (excl. U.K., U.S.S.R.)	220	10	4.5	10	4.5
1970	World	2700	100	3.7	100	3.7
1980	United States	180	10	5.6	10	5.6
1980	France	52	2	3.8	2	3.8
1980	Germany	56	1	1.8	1	1.8
1980	Japan	110	1	0.9	1	0.9
1980	United Kingdom	62	1	1.6	1	1.6
1980	Italy	52	1	1.9	1	1.9
1980	Canada	32	1	3.1	1	3.1
1980	China	700	10	1.4	10	1.4
1980	India	420				

[illegible]

A horizontal bar chart titled "Percentage of respondents who believe that the current administration is responsible for the current state of the world." The x-axis represents the percentage, ranging from 0 to 100. The y-axis lists age groups. The bars are black. The data is as follows:

Age Group	Percentage
18-29	10
30-39	35
40-49	10
50-59	15
60-69	10
70-79	25
80-89	20
90+	55
18-29	85
30-39	20
40-49	10
50-59	45
60-69	10
70-79	15
80-89	10
90+	55
18-29	20
30-39	10
40-49	45
50-59	10
60-69	15
70-79	10
80-89	100
90+	20
18-29	35
30-39	10

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	8												

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	8												

Row	Bar Length (approx. % of total width)
1	5
2	100
3	5
4	65
5	5
6	15
7	5
8	25
9	5
10	35
11	5
12	40
13	5
14	25
15	5
16	30
17	5
18	30
19	5
20	75
21	65
22	35
23	100
24	85
25	45
26	15
27	45
28	25
29	100

Veritext Legal Solutions
www.veritext.com

[illegible]

Row	Bar Length (approx. % of total width)
1	15
2	10
3	60
4	40
5	40
6	70
7	10
8	65
9	95
10	85
11	35
12	10
13	90
14	20
15	10
16	85
17	55
18	75
19	10
20	55
21	10
22	100
23	55

1 A. Oh, let's see. It was 2-0-6 or 2-0-8.

2 Q. How long were you a part of the VSEA?

3 MS. JOSELSON: What would the possible
4 relevance of that be? How could that possibly
5 lead to the discovery of any relevant
6 evidence?

7 MR. LAFATA: The objection is improper.

8 BY MR. LAFATA:

9 Q. You can answer the question.

10 MS. JOSELSON: The question is improper.

11 MR. LAFATA: Don't interfere with the
12 deposition. If you have an objection, you can
13 make it, but a speaking objection is improper
14 and you know that.

15 BY MR. LAFATA:

16 Q. Ms. Crawford, you can answer --

17 MS. JOSELSON: You know that discovery is
18 supposed to lead to the discovery of relevant
19 evidence.

20 BY MR. LAFATA:

21 Q. Ms. Crawford, you can answer the question.

22 MS. JOSELSON: I think this is an
23 interference with her first amendment rights
24 and political association. Completely
25 inappropriate.

1 MR. LAFATA: That objection is
2 inappropriate and you know that.

3 MS. JOELSON: I think the question is
4 inappropriate.

5 MR. LAFATA: Well, you've made your
6 objection. You can file a motion if you want.

7 MS. JOELSON: I think we will.

8 MR. LAFATA: Go for it.

9 BY MR. LAFATA:

10 Q. Go ahead.

11 A. I joined VSEA the first week I was employed at
12 the veterans' home, which was '87, and I
13 stayed a member until the day I retired.

14 Q. Were you part of any labor union organizations
15 at your other jobs?

16 A. No.

17 MS. JOELSON: Same objection.

18 BY MR. LAFATA:

19 Q. Other than the progressive party and the VSEA,
20 were you part of any other civic organizations
21 in the area?

22 MS. JOELSON: Objection, but you can
23 answer.

24 A. I am thinking. No.

25 BY MR. LAFATA:

1 Q. Were you part of any organization involving
2 fluoridated water?

3 A. Oh, yes. Yes. Bennington Citizens Against
4 Fluoridated Water.

5 Q. And how long were you part of that
6 organization?

7 A. I still am. We formed that about, boy, maybe
8 five or six years ago when there was a push to
9 add it to the water.

10 Q. What sort of work do you do as part of this
11 organization?

12 A. Well, when there was an active push to put it
13 in the water and it was going to be voted
14 upon, myself and other members of the group
15 would hold public meetings. We would have
16 slideshows. We would have experts come in.
17 We went door to door before the town meeting
18 and we won.

19 Q. The outcome of the vote was favorable?

20 A. The outcome of the vote was no fluoride.

21 Q. Before joining Vermont Citizens Against
22 Fluoridated Water, did you have any
23 involvement with any organizations about
24 fluoridated water?

25 MS. JOELSON: Objection. You can

1 answer.

2 A. Paul Connett is the expert, and I would be on
3 his -- I liked his page and got all his
4 articles.

5 BY MR. LAFATA:

6 Q. What page do you mean?

7 A. Facebook -- Facebook page.

8 Q. Did you ever write letters to the editor as
9 part of being in Vermont Citizens Against
10 Fluoridated Water?

11 A. Yes, I did.

12 MS. JOELSON: Same objection, to this
13 whole line of questions.

14 (Deposition Exhibit No. 20 was marked for
15 identification.)

16 BY MR. LAFATA:

17 Q. Ms. Crawford, do you have Exhibit 20 in front
18 of you?

19 A. I do.

20 Q. And do you see at the top it says: War of
21 words, with teeth?

22 A. Yes. Not my words but the editor put that.

23 Q. The editor put that.

24 Did you write this -- the rest of this
25 letter to the editor?

1 A. Yes, I did.

2 Q. Okay. Do you recall receiving any response to
3 your letter?

4 A. I don't recall.

5 Q. In the first sentence you say, we would like
6 to respond to an article by Sam Hemingway.

7 Do you see that?

8 A. I do.

9 Q. And who -- when you say we, do you know who
10 you're referring to?

11 A. The other advocates that were in my group.

12 Q. And who is Sam Hemmingway?

13 A. He is a reporter for the Burlington Free
14 Press.

15 (Deposition Exhibit No. 21 was marked for
16 identification.)

17 Q. Ms. Crawford, do you have Exhibit 1 in front
18 of you?

19 A. I do.

20 Q. Is this the article by Sam Hemingway that you
21 were responding to?

22 A. Yes.

23 MS. JOELSON: I would just like to note
24 that both Exhibit 20 and 21 seem to have
25 markings on them that the witness did not

1 make. They were presented to her in that
2 form. I also object to both exhibits.

3 BY MR. LAFATA:

4 Q. Ms. Crawford, on Exhibit 20, do you see in the
5 second paragraph you refer to a man name Tommy
6 Ivey?

7 A. I believe -- yes, I do.

8 Q. And who is Tommy Ivey?

9 A. I don't recall. I believe he is a dentist.

10 Q. Okay. And in Exhibit 21, do you see on the
11 far right-hand column there is a paragraph at
12 the top, says Ivey said.

13 Do you see that?

14 A. Yes.

15 Q. Ivey said 3200 studies have determined that
16 fluoridation has no downside.

17 Do you see that section?

18 A. I do.

19 Q. And in the next paragraph, do you see it says,
20 he also said fluoride is natural -- naturally
21 in all water, including ocean water, so
22 Crawford's allergy claim is impossible, and
23 the idea that public water systems are being
24 used as a dumping ground for bad fluoride
25 defies logic.

1 Do you see that?

2 A. I do.

3 Q. Do you have a reaction to his statement?

4 MS. JOSELSON: Objection. You can answer
5 it. We'll move to strike.

6 A. Natural fluoride comes from rocks, water going
7 over and gradually breaking it down to little
8 tiny increments. Water has it.

9 The fluoride they add to the water
10 systems to fluoridate the water is a byproduct
11 of phosphate fertilizer production. The
12 smokestacks are shaken; the residual toxic
13 waste product is collected; put into bags;
14 transported across the country in trucks
15 marked hazard. There has been some accidents
16 and people have had to be evacuated from miles
17 around because the fluoride that they add
18 is -- is toxic. It's not a natural mineral.
19 It's not even a mineral, the breakdown of
20 rocks.

21 Of those studies, Paul Connett, the
22 expert that's noted, tried to get those
23 studies. They don't exist. They are things
24 that dentists write. And in the oath that
25 dentists take, part of the thing they promise

1 to do is to push water fluoridation. They
2 have their own agenda. And I think it's bull.
3 That is my reaction.

4 BY MR. LAFATA:

5 Q. Well, thank you.

6 And when you said that Paul was trying to
7 get these studies, do you mean the studies
8 referred to by Ivey here?

9 A. Yes.

10 Q. He was not able to get those?

11 A. There are no -- there are no scientific
12 studies.

13 Q. Paul Connett is in your article here?

14 A. Yes. He goes worldwide against water
15 fluoridation.

16 Q. When you wrote the letter to the editor,
17 Exhibit 20, do you author the text of the
18 letter yourself?

19 A. Yes, I wrote it myself.

20 Q. Did you do your best to be truthful in what
21 you said in the letter?

22 A. I did.

23 MS. JOELSON: My objection continues
24 through this whole line.

25 (Deposition Exhibit No. 22 was marked for

1 identification.)

2 BY MR. LAFATA:

3 Q. Ms. Crawford, do you see Exhibit 21 in front
4 of you?

5 MS. JOSELSON: No.

6 BY MR. LAFATA:

7 Q. What exhibit is in front of you?

8 A. 22.

9 Q. Thank you for being cooperative.

10 Do you see Exhibit 22 in front of you?

11 A. Yes.

12 Q. Do you see at the top this is from the
13 Bennington Banner?

14 A. Yes.

15 Q. Dated May 2, 2001. Do you see that?

16 A. Yes.

17 Q. And the title, it's emotion, not science. Do
18 you see that?

19 A. Yes.

20 Q. Was this a title that you gave to this piece?

21 A. No.

22 Q. Do you know who gave that title?

23 A. I imagine the editor or whoever controls those
24 things at the Banner.

25 Q. Did you write the article yourself though?

1 A. It's been a while. Let me refresh my memory.

2 Yes.

3 Q. Okay. In the bottom there it says Linda
4 Crawford, right?

5 A. Yes.

6 Q. And kind of like with the last article, when
7 you wrote this one, did you do your best to be
8 truthful with what you said?

9 A. Yes.

[REDACTED]

[illegible]

Row	Bar Length (approx. % of total width)
1	5
2	95
3	75
4	25
5	50
6	30
7	50
8	25
9	50
10	55
11	50
12	100
13	30
14	70
15	40
16	50
17	50
18	50
19	50
20	50
21	50
22	50
23	50
24	50
25	50

25 THE WITNESS: Yes.

1 MR. LAFATA: Pass the witness.

2 CROSS-EXAMINATION

3 BY MS. JOELSON:

4 Q. Linda, there were a couple of questions that
5 Mr. LaFata asked you. One concerned Exhibit
6 17. Could you pull that out?

7 A. I have it.

8 Q. Okay. And do you remember that this is your
9 2016, 2017 tax bill?

10 A. Yes.

11 MS. JOELSON: Is there another tax bill
12 that you showed her, Paul?

13 MR. LAFATA: It was an assessment.

14 MR. SILVER: It was the change in
15 assessment one. There it is.

16 BY MS. JOELSON:

17 Q. And Exhibit 16?

18 MR. SILVER: There you go.

19 MR. LAFATA: You got it.

20 BY MS. JOELSON:

21 Q. Do you remember being asked questions about
22 these documents?

23 A. I do.

24 Q. And do you remember being asked something
25 like -- I don't have the exact phrasing --

1 whether you agreed with the assessed value in
2 these documents?

3 MR. LAFATA: Object to the form.

4 MR. SILVER: -- any reason to object to
5 that.

6 A. Are you asking me if we grieved --

7 BY MS. JOSELSON:

8 Q. No. I am asking you if you remember being
9 asked the question by Mr. Lafata, something to
10 the effect of whether you agreed with the
11 assessed value in these documents?

12 MR. LAFATA: Objection to form.

13 BY MS. JOSELSON:

14 Q. Do you remember that question?

15 A. I do remember that question.

16 Q. So what did you mean by that?

17 MR. LAFATA: Object to form.

18 A. I think I understood it did you grieve this
19 assessment.

20 BY MS. JOSELSON:

21 Q. And did you?

22 A. We did not grieve it.

23 Q. Do you believe that the assessed value in
24 Exhibit 17 reflects what you believe your fair
25 market value of your house is?

1 MR. LAFATA: Object to form.

2 A. No. No, I misunderstood.

3 BY MS. JOELSON:

4 Q. Okay. So you didn't grieve the -- the
5 assessed valuation listed in Exhibit 17?

6 A. No.

7 Q. You were also asked some questions about
8 whether you changed any of your patterns of
9 socializing or plans for socializing.

10 Do you remember some of those questions?

11 A. I do.

12 Q. Other than -- so have you changed at all the
13 ways in which you socialize with people in
14 your house?

15 A. Well, I have a friend, ever since the PFOA
16 thing came up she won't drink -- even before
17 we started using bottled water -- she wouldn't
18 have a cup of coffee or tea with me unless we
19 used bottled water.

20 Q. She lives outside the zone?

21 A. She lives in Pawlet.

22 Q. You were also asked questions about
23 out-of-pocket expenses that you have incurred
24 since the discovery of PFOA in your well.

25 Do you remember that?

1 A. Yes.

2 Q. And you mentioned the cost of bottled water
3 that you used?

4 A. Yes.

5 Q. What about the -- the expense for the water
6 for the pool that you talked about?

7 A. Oh, yeah.

8 MR. LAFATA: Object to form.

9 A. We have to pay the town for a permit to use
10 the fire hydrant, so --

11 MS. JOSELSON: That is all I have.

12 MR. LAFATA: Mrs. Crawford, some
13 follow-up questions based on your testimony
14 there.

15 REDIRECT EXAMINATION

16 BY MR. LAFATA:

17 Q. Do you have any plan to contact the Town of
18 Bennington or any tax authority to tell them
19 that their assessment of your property is too
20 low?

21 A. No, because they might say it's too high. I
22 don't know -- they might say -- no, because
23 then they would put it up and I would have to
24 pay more taxes. That is why we didn't grieve
25 it.

1 Q. If you believe that the Town of Bennington has
2 made a mistake in valuing your property, do
3 you think that you should tell them?

4 MS. JOSELSON: Object to the form.

5 A. No.

6 BY MR. LAFATA:

7 Q. Do you think it would be fair for them to be
8 operating underneath that mistake?

9 MS. JOSELSON: Object to the form.

10 A. I realize that assessed value is not the same
11 as fair market value. So I guess I -- we
12 didn't want to -- we didn't want to grieve it.

13 Q. Have you grieved your tax bill before?

14 A. Never.

15 Q. Do you know what would be involved in grieving
16 your tax bill?

17 A. No.

18 Q. During lunch or any of the breaks today, did
19 you discuss the substance of your testimony
20 with anybody?

21 MS. JOSELSON: Other than counsel?

22 BY MR. LAFATA:

23 Q. Did you discuss the substance of the testimony
24 today?

25 MS. JOSELSON: You can't ask any

1 questions regarding what discussions our
2 clients have had with their attorneys.

3 MR. LAFATA: The substance of live
4 testimony, you're objecting to that?

5 MS. JOSELSON: I'm telling you I will
6 instruct this witness not to answer any
7 questions regarding discussions that she has
8 had with counsel at any time.

9 BY MR. LAFATA:

10 Q. Mrs. Crawford, my question to you is, did you
11 have any discussion during the lunch or break
12 about the substance of your testimony during
13 today's deposition?

14 MS. JOSELSON: And I'm instructing the
15 witness not to answer any questions regarding
16 discussion with counsel. You can ask her if
17 she's had any discussions with anyone about
18 the substance of her testimony other than
19 counsel.

20 BY MR. LAFATA:

21 Q. About that.

22 A. Would you repeat?

23 Q. Sure.

24 Other than counsel, have you had any
25 discussions about the substance of your

1 testimony today?

2 A. I haven't even seen anybody other than my
3 counsel.

4 Q. Mm-hmm. Okay.

5 MR. LAFATA: Pass the witness.

6 MS. JOELSON: You know you're not
7 allowed to ask any questions that a witness --
8 that a plaintiff talks to the attorneys about.

9 MR. LAFATA: Do you have any redirect
10 questions?

11 MS. JOELSON: No.

12 MR. LAFATA: All right. I leave open the
13 deposition in case there's additional
14 discovery that comes forward.

15 MS. JOELSON: Yeah, we'll object to
16 that.

17 MR. LAFATA: Yeah.

18 THE VIDEOGRAPHER: At 3:40 p.m. we've now
19 reached the end of the media unit number
20 three, and we are going off the record and
21 concluding our deposition. And we are off the
22 record.

23 * * * * *

24

25

1 **ACKNOWLEDGMENT OF DEPONENT**

2

3 I have read the foregoing transcript of

4 my deposition and except for any corrections or

5 changes noted on the errata sheet, I hereby

6 subscribe to the transcript as an accurate record

7 of the statements made by me.

8

9 _____

10 **LINDA CRAWFORD**

11

12 **SUBSCRIBED AND SWORN** before and to me

13 this ____ day of _____, 20__.

14

15

16 _____

17 **NOTARY PUBLIC**

18

19

20 **My Commission expires:**

21

22

23

24

25


CERTIFICATE

I, Beth Gaige, a Registered Professional Reporter, hereby certify that the within-named deponent was sworn to testify the truth, the whole truth, and nothing but the truth in the aforementioned cause of action.

I further certify that this deposition was stenographically reported by me and later reduced to print through computer-aided transcription, and the foregoing is a full and true record of the testimony given by the deponent.

I further certify that I am a disinterested person in the event or outcome of the above-named cause of action.

IN WITNESS WHEREOF, I subscribe my hand and affix my seal this 27th day of April 2018.



Beth Gaige, RPR

Notary Public

My commission expires:

August 22, 2019

E R R A T A S H E E T

IN RE: SULLIVAN, et al. vs. SAINT-GOBAIN

DATE: 4/25/2018

PAGE	LINE	CORRECTION AND REASON
------	------	-----------------------

(DATE)

LINDA CRAWFORD

[& - 30]

Page 1

&	170:4,6,9,10,12	1986 16:15 18:11	91:18,23 92:10
& 1:16 2:5,9,14,18 6:1	136,200 160:7,17 161:16	1987 13:25 14:1	116:23 161:6
0	14 4:3 95:19 151:19 153:25 170:8	1990 22:21 29:23 38:7,11 128:21	163:24 213:9
00125 1:6	140 148:25	1991 33:14	2017 3:19,24 48:3 64:17 65:3,18 93:6 161:3,6,18 175:4 213:9
04 112:11,12,13 152:23 153:3,5	143 4:2	1992 154:6,14,18	2018 1:18 5:7 221:17
05201 2:10 6:3 106:14	148 153:21,22	1999 153:17	2019 221:24
05753 2:6	148,000 156:14,17	1:50 151:14	202 4:10
08 112:11,12,14 113:12 153:1,5	15 4:4 138:6 151:1 154:20,22	2	203 4:11
1	150 117:7 149:18	2 3:13 4:12 29:6,8 207:15	2040 110:12
1 3:12 9:17,21 170:8 173:16 203:17	151 4:3	2-0-6 199:1	206 4:12
1.4 113:22	154 4:4	2-0-8 199:1	21 3:20,24 4:11 86:2 93:6 203:15 203:24 204:10 207:3
10 3:23,23 91:10 91:12,18	155 148:25	2.8 84:25 86:8	212.849.7000 2:16 2:20
10/24 61:15	159 4:5	2.8. 84:24	213 3:4
100 149:18	16 4:5 80:14,23 159:15,18 213:17	20 4:10 32:15 38:23 39:6,10,11 39:12 45:15,17 46:2,13,14 47:15 47:19 50:12,18 51:1,3,18 53:9 59:7 60:3 65:23 66:2 67:1 68:14 94:25 136:4 202:14,17 203:24 204:4 206:17 208:14 209:8 220:13	216 3:4
10010 2:15,19	160 4:7	200 117:7 148:24	22 3:19 4:12 64:17 65:18 206:25 207:8,10 221:24
10:27 53:25	17 4:7 51:6 160:19 160:22 213:6 214:24 215:5	2001 4:12 207:15	23 155:16
10:45 54:5	173 4:8	2004 153:8,11,20 155:1 156:11,17	24 9:5
11 3:24 92:22,24 125:15 150:16 170:8	174 4:9	2007 173:17	25 1:18 5:7
119 65:7	18 4:8 29:23 173:11,14	2008 159:24 160:10,15	26 156:19
11:39 101:7	180 97:2,8	2010 11:10,11 14:2 14:4 32:22,23 60:24	27th 221:17
11:44 101:11	185 148:24	2012 19:22	28 92:10 158:13
11:50 105:21	18th 60:23	2016 3:20,23 62:20 86:2 90:12,15	29 3:13
12 4:1 40:9 41:3 101:2 125:12,18 125:21 170:8	19 4:9 33:14 174:17,19		2:06 151:21
12/19/91 34:11	1950s 142:23		2:45 181:20
122,600 160:4	1961 111:8		2:59 181:23
125 4:1	1965 111:8		3
12:56 105:25	1974 19:24 101:21		3 3:14 33:3,5 90:12 154:6
13 4:2 95:19 143:10,13 161:3	1977 16:13		3,000 121:20
	1978 155:25		30 108:16 125:8
	1985 106:19 140:9 152:17 153:14		

[300 - ago]

Page 2

300 96:24,25 97:5 97:10	109:4,17	abate 33:21	addressed 86:4
	7	abated 25:22	91:20 160:1
3200 204:15	7 3:3,19 64:6,8	abdominal 44:22	adjust 37:21
33 3:14 106:16	70 19:5 96:11	52:11	adjustment 37:22
139:18	74 19:5	ability 9:12	administer 6:9
351 2:5	75 19:5,5	able 24:11 149:15	15:8,11,17,21
3:30 176:5	8	206:10	17:13,24
3:40 219:18	8 3:20 85:19,21	aboveground	administered 7:6
4	802.388.6356 2:6	122:22	17:17 50:5
4 3:15 54:3,18,19	802.442.6341 2:10	abrasive 76:1	administration
4.1 93:22 94:3	80s 124:6	accepted 153:2	15:20 17:16
95:22 96:3	85 3:20 106:18	accidents 205:15	admissions 11:15
4/25/2018 222:3	152:8	accurate 156:24	11:18 13:4,11,17
40 108:4	87 21:18 200:12	220:6	14:10 44:12
40s 51:23	89 3:22	ache 58:15,18	admit 13:1
480 57:17	9	acid 47:8	admitted 11:20,21
4th 62:20	9 3:12,22 89:21,24	acknowledgment	advising 63:5,12
5	146:17	220:1	advocates 203:11
5 3:16 60:6 97:21	9/19/1947 8:1	acres 113:22	aerosols 208:16,24
155:1 156:11	90s 44:19 53:15	acromion 210:24	affect 9:12
5.7 86:13	58:11 120:13	acrylamide 209:1	affiliations 6:14
507 1:17 2:9 6:2	129:2 132:9	acting 29:3	affix 221:17
51 2:15,19	133:15,19	action 1:5 6:11	aforementioned
54 3:15	91 3:23	79:23 221:6,15	221:6
58,5 111:22	92 3:24	active 19:18	afternoon 106:3,4
59 163:2,8	94 72:7	201:12	aftershave 27:14
5:16 1:6	95 72:15 97:23	activity 147:14	age 113:17,19
5th 159:23	131:1	166:8	120:19
6	96 72:9 131:1	actual 23:9	agencies 171:24
6 3:18 23:22 62:8	99 21:23 152:19	add 69:19 128:19	agenda 206:2
62:11,15 175:3	153:19,22	129:1 201:9 205:9	agent 162:2,4,6
6,000 97:21	99,000 154:15	205:17	163:10 209:3
6/5/2008 4:6	9:25 1:18 5:6	added 128:15,16	agents 211:7
60 3:16	a	142:16 143:6,7	aggravating
61,5 153:16	a.m. 1:18 5:6	addison 170:17	147:17 150:14
62 3:18	53:25 54:5 101:7	addition 116:12	aggravation 147:3
64 3:19	101:11 105:21	additional 157:13	149:23 150:5
643 90:4 92:2	aarp 162:7,8	219:13	ago 26:6 60:3,3
93:12 106:14,15		address 90:7	64:24 72:11 121:7
106:17,25 108:19		93:14 106:13	134:13 139:19
			146:1 201:8 210:3

agree 5:15 88:3 agreed 5:2 214:1 214:10 ahead 9:22 200:10 aided 221:9 aids 59:23 air 27:25 28:1 77:17 78:12 134:1 208:21 ajax 76:1 al 1:4 5:19 222:2 albany 103:5 180:14,14,19 181:6 alcohol 68:21,23 184:11 aldrin 209:5 algaecide 210:14 210:18 alive 72:3,4 alleged 78:9 allergic 42:11 43:8 43:13 56:5 allergies 42:2 55:11 allergy 204:22 allowed 32:15 219:7 almonds 184:6 amendment 199:23 amounts 27:16,20 analytical 3:22 90:1 anesthesia 43:24 anesthetic 209:7 209:11 angioedema 43:15 angry 149:25 150:22	animals 118:19,22 anise 194:16 annoyance 147:3 149:22 150:5 annual 51:21 answer 8:18 10:4 36:5 37:9 43:11 51:12 88:5 91:3 95:9,16 110:17,19 112:24 119:4 167:1,17 172:3 174:6 177:20 180:22 181:3 199:9,16,21 200:23 202:1 205:4 218:6,15 answered 59:12 91:3 106:9 answers 8:9,16 antibiotic 43:17 antibiotics 43:20 103:20 antiques 165:17 165:18 antiseptic 75:13 anxiety 41:5 anybody 10:25 150:22,23 217:20 219:2 anymore 32:8 149:7 198:8 appear 156:24 157:25 appearance 6:17 appearances 6:14 apple 184:13,15 184:17 187:5 apples 184:21 appliance 132:15 132:21 133:23 136:9,13 138:2	appliances 125:5 134:17 application 11:20 applications 14:15 apply 14:16 appraisal 4:3,4 152:17,20 153:5,6 153:11,14,17,20 154:2,13,14,18 155:19 156:11,14 156:17 159:21 appraised 152:2,5 152:7,18,25 153:8 153:15,18 160:9 161:13 164:18 appraiser 168:22 appreciate 20:19 appropriate 12:14 appropriately 98:3 approved 94:13 approximately 110:10 apricots 185:1 april 1:18 3:19 5:7 64:17 65:18 221:17 aquifer 78:1,23 96:10,13,14,16,22 area 79:18 131:24 132:18,22 141:17 142:14 165:9 180:12 198:7,15 200:21 areas 114:4 arm 29:1,4 arsenic 209:13 art 196:10 arthritis 71:10,12 73:16 74:2	article 4:10,11,13 203:6,20 206:13 207:25 208:6 articles 202:4 arugula 185:3 asbestos 196:23 aside 14:9 54:16 62:1 71:11 145:2 190:22 asked 59:12 91:2 148:8 169:7 172:12 213:5,21 213:24 214:9 215:7,22 asking 8:7 172:23 214:6,8 asleep 174:2,4,15 asparagus 118:3 185:5 aspects 102:25 asperger's 73:24 74:2 asphalt 209:15,24 aspirin 56:7 assess 11:22 12:8 assessed 160:4 161:19 214:1,11 214:23 215:5 217:10 assessment 153:3 213:13,15 214:19 216:19 assessments 10:18 assigned 17:5 assisted 105:8 associate's 101:18 101:19 104:12 associated 171:4 association 198:20 199:24
--	--	---	--

assume 30:21 42:12 asthma 59:3 asymptomatic 61:18 62:1 83:13 ate 17:10 ativan 49:4 attached 117:17 117:18 attempt 41:22 attorney 6:18 attorneys 218:2 219:8 audio 5:13,13 august 221:24 author 206:17 authority 216:18 authorized 6:9 available 31:11 146:12 avenue 2:15,19 average 179:15 avoid 44:4 aware 74:4 167:20 awful 149:8	bactrim 43:12,17 43:20 55:19 bad 150:22 168:1 171:18 204:24 bags 205:13 bake 195:15 bananas 185:10 bank 155:3 banner 80:21 207:13,24 barbecue 69:21,24 70:1,3,6,10,18 barium 53:12,21 barr 2:9 barrsternberg 1:16 6:1 barrsternberg.com 2:11 based 13:2 216:13 basement 110:7 119:24,25 138:7 basic 14:25 basically 48:24 85:12 121:9 basil 185:12 bath 158:6,11 bathe 169:11 bathroom 77:2 134:4,6,9,17 135:11,17 140:14 140:16,19,22 bathrooms 110:1 123:23 baths 17:8 beach 178:20,22 beans 189:19 bed 17:8,9 22:1,2 22:6 bedroom 129:5,14 129:25 130:5,12 130:13 131:5,12	131:14 133:13,21 140:11,17 143:3 bedrooms 109:24 120:1 123:24 124:13,14 129:22 158:3,9 beds 22:4 bedside 17:6,7 beef 70:2,4 187:20 188:25 193:13 beer 69:3 184:11 185:16 beginning 6:18 39:16 101:12 151:22 behalf 1:4 5:20 believe 9:11 10:1,1 27:17 79:4 85:15 89:1 100:1 120:13 135:20 146:4 149:18 152:15 153:4 159:14 162:11,15 174:14 204:7,9 208:12 212:1 214:23,24 217:1 belong 198:12 benadryl 31:24 32:2 beneath 33:25 90:11 92:9 146:18 156:13 174:25 benefits 14:16 benign 46:18 bennington 1:17 2:10 4:5,7 6:2 11:12 42:5 79:18 79:19 80:21,25 81:1,9 82:1,19 84:20 106:14,23 107:8 155:4 161:1	179:6,20 180:4,12 181:8 201:3 207:13 211:24 212:2 216:18 217:1 benzene 210:4 beryllium 210:6 best 151:9 177:21 206:20 208:7 beth 1:14 6:7 8:10 117:20 221:2,21 better 14:6 64:23 65:3 beyond 32:14 114:25 bicycles 111:2 big 34:24 115:1 144:18,22 bill 4:7 145:5,6,8 145:11 146:10 160:13,25 170:25 213:9,11 217:13 217:16 birth 7:25 bit 81:4 bj's 181:4 black 185:18 bleach 75:24 bloating 45:7 52:11 blood 15:23 49:5,8 49:19,21,24 50:3,5 50:8 59:16 65:6 65:11 83:8 84:10 84:11,14,16 85:8 86:14 87:4,9 104:10 blown 88:14 blue 137:9,11,19 bodies 79:13
b			
b 3:10 baby 105:9 back 18:12,15,19 21:20,21 22:1,1,8 22:10 27:22 54:6 86:21 94:7 101:12 105:7,25 113:25 114:5,9,10,23 116:11 122:19 127:4 139:9 140:6 151:22 181:24 backyard 139:10 bacon 191:17 bacteria 164:6,8 164:13			

body 22:6 79:2 83:18 88:10 bok 185:22 bone 52:21,23,25 53:6 bones 53:3 book 34:11 books 197:16 bookshelf 133:4 142:19 bookshelves 123:23,25 129:10 129:11 131:6 142:16 border 181:9 born 104:22 108:14 bottled 108:23 109:3,5 169:4,8 176:20 177:2 215:17,19 216:2 bottles 176:16,17 176:18 bottom 29:16,18 31:6 33:10 57:17 93:19 132:21 154:5 155:15,21 156:10 158:8,11 208:3 bought 98:6 107:4 111:20 boundary 81:17 bowel 75:9,11 box 138:14,14 161:14 boy 134:23 194:19 201:7 brain 56:20,22 73:7 brand 123:17	brandies 189:6,8,9 brazil 185:24 bread 193:19,20 195:22 break 8:25 18:13 53:24 101:5 151:11 218:11 breakdown 205:19 breakfast 183:24 breaking 205:7 breaks 27:21 217:18 breast 56:15,18 72:11 breath 25:6 26:18 30:9,12 33:20 77:15 breathe 24:25 25:3 106:9 breathing 25:2,5 brick 109:22 brief 20:11 54:2 151:18 181:22 182:8 briefly 19:3 71:3 bring 145:15 179:3 broccoli 186:1 bronchitis 47:21 brother 71:18,23 123:12,13 brothers 71:15,17 brown 186:3 brussels 186:5 bucket 136:18 139:2,3 buckets 136:24 137:1 buckley 154:8,11	bugs 103:8 building 33:18,22 35:3 196:19 built 111:6 118:18 123:24,25 131:6,9 133:4 139:18 155:23,25 bull 206:2 bullet 86:12 bunch 172:23 buried 120:3,6 burlington 4:11 203:13 burning 109:13 burnt 14:5 bury 147:24 148:3 business 165:8 167:10 168:9 busy 178:24 butter 186:7 191:25 buy 123:14 125:3 185:9 212:10 buying 112:20 169:4 byproduct 205:10 c c 2:1 7:23 39:2 cabbage 186:9 cabinetry 126:22 cadmium 210:8 caesarean 45:16 calcium 54:11 call 12:12 26:8 107:17 138:15 called 26:3,4,10,12 30:18 34:4 42:23 55:11 57:16 61:3 77:5 79:23 107:15 144:7	calls 88:4 95:15 cambridge 18:24 cancer 52:3 56:15 56:18,20,22,24 57:2 71:3,6,11 72:12 73:2,2,7 79:3 83:18 88:14 175:15,20,23 candy 184:9 capitol 39:2 carbon 210:10 care 3:15 18:15,17 20:9 22:10 24:4,7 25:20 27:8,10 31:21 37:24 38:13 38:21,24 42:21 54:20,25 55:3 105:11,14 123:3 180:10,11 cared 13:8 carpet 77:8 124:11 124:12,20 132:1 134:10,11 carpeted 133:16 143:4 carpeting 133:18 carroll 3:18 31:20 31:22 38:1,4,6,10 38:14,17,21 40:4 47:24 48:1,7 49:6 49:22 55:4,5 62:18 63:5,12,19 64:2,14,19,22 65:2 65:17 83:3,6,19,21 84:1 85:5,8 86:17 87:7,25 175:22 180:3 carroll's 62:25 carrots 118:3 186:11
--	--	--	--

carry 32:2,4,7,9 32:18 carrying 32:20,23 case 10:17 13:5 35:7 36:21,25 37:5 78:6,15 79:8 79:23 86:10 169:24 171:3,10 173:4,9 219:13 cases 32:13 169:10 casselton 101:24 castleton 101:23 101:25 102:1,2 cat 50:14,15,18,25 61:14 cats 118:23,24 165:20 182:18 183:2,3,5 caught 61:25 cauliflower 186:13 cause 51:15 87:20 221:6,15 caused 87:22 97:25 causes 43:14 47:9 ceiling 140:1 142:21 celery 186:15 cells 49:19 cellular 5:10 cement 119:15,16 center 3:17 16:10 16:12,17,25 17:4 18:11,22 20:3 21:17 22:19 23:18 136:8 173:20,20 178:2 ceramics 196:9 cereal 186:17	certain 30:15 certificate 221:1 certified 6:4 certify 221:3,7,13 chair 132:16,25 change 38:16 95:22 100:25 101:4 124:25 127:23 150:2 159:20 166:3 168:19,23 182:24 213:14 changed 124:5,10 125:7 126:23 127:14 159:7 169:18 215:8,12 changes 122:11 124:22 134:16 220:5 chapter 198:23,25 characterization 37:9 characterize 119:1 charcoal 69:21 charge 164:10 chart 83:10 93:17 check 34:19 53:3 150:12 cheese 186:21 chelsea 73:12,15 73:21,24 74:5 chemfab 79:21 168:7,10,16 172:1 chemfab's 167:10 chemical 24:20,21 25:24 26:3,21 27:1 28:8 30:7,15 30:18,20,23,25 34:24 35:2 78:8 79:1 208:10	chemicals 24:17 24:18 25:17 26:24 33:2 34:17 35:4 74:8 90:1 117:3 146:9 163:24 164:1,16 208:13 210:12 chemistry 123:3 cherries 186:19 chest 33:21 chicken 70:2,3 186:23 195:8 child 16:20 children 20:21 73:8,13,19 74:3 chilies 186:25 chimney 159:5 chips 192:23 chlorambucil 65:22 66:3 chloride 212:19 chlorine 210:14 chloroform 210:20 chlorquine 210:22 chocolate 187:2 choice 66:22 109:6 cholesterol 40:18 41:10,23 49:13 63:8,13 64:5,20,23 65:3 68:18 chopper 42:5 choy 185:22 chronic 47:2 cider 184:13 cinnamon 187:4 circulating 88:9 citizens 201:3,21 202:9 citrus 187:6	city 107:12,13,15 city's 100:12 civic 198:6,9 200:20 civil 1:5 claim 21:14 22:22 23:9 28:15,22,25 36:1 204:22 claims 22:17 23:17 24:15 36:25 37:5 151:4 clarify 157:6 claritin 9:8,11 41:25 42:1 57:25 58:1 class 1:4 79:23 80:3,6 143:18 150:19,25 151:4 classes 102:21,24 103:1,14,23 classification 143:18 clay 119:7 clean 34:1 146:9 177:3 cleaned 24:20 122:4 178:12 cleaner 28:5 31:1 77:2,8,13 cleaners 76:1 77:11 cleaning 24:19 25:18 35:4 76:5 77:14 208:19,19 208:20 clear 8:22 clientele 14:22 clients 218:2 clip 125:23 clofibrate 66:5
---	---	---	--

close 28:17 40:2 53:4,16 118:15 172:15 closed 18:23 closet 131:14 142:9 closets 123:24 closing 101:8 clothes 177:15 178:12 197:24 clothing 198:2 coal 211:1 coated 197:24 coating 197:25 cocoa 187:8 coconuts 187:10 code 21:22,23 coffee 69:7,9,11,20 187:25 215:18 collard 187:12 collect 12:14 collected 89:5,8,12 89:16 205:13 college 104:15,18 colloquy 6:22 9:16 55:8 101:10 182:9 colon 45:2 175:14 175:20,23 colonic 175:16 colonoscopies 46:9 46:12,17 colonoscopy 4:9 46:7 175:12 coltsfoot 187:14 column 204:11 come 12:19 86:21 96:11 99:4 171:17 182:5 184:22,24 201:16 comes 98:19 205:6 219:14	comet 76:2 comfort 95:11 96:9 comfrey 187:16 coming 101:12 105:25 145:15 150:11 151:22 181:24 commencing 1:18 commercial 165:8 166:7 commission 220:20 221:23 commit 83:23,24 committee 13:4,12 13:17 common 163:21 communications 171:23 173:2 company 88:25 97:16 compares 86:19 compensated 79:11 compensation 21:14 22:17 23:17 24:14 28:15 competently 144:8 complain 26:4,8 171:16 complaining 167:25 complete 49:8 completely 180:23 199:24 complicated 13:3 complications 45:9 complying 55:7 57:14	composition 34:12 computer 130:10 221:9 concentrated 211:13 concentrations 94:24 concerned 78:24 81:9 99:12 117:23 213:5 concluding 151:15 219:21 concrete 138:8 condition 11:23 12:8 47:4,7 52:4 59:25 73:25 83:22 85:16 87:21 104:2 conditioning 134:1 conditions 41:7 47:17 53:3 71:6 71:12,24 72:5 73:3,6,14 74:4,6 confident 164:5 conflicts 150:18 connect 145:20 159:5 connected 117:14 157:16 connection 34:19 120:9 152:9 155:7 171:20 connett 202:2 205:21 206:13 consciousness 42:18,19 consider 116:23 constipation 45:7 construction 22:2 109:21	consult 19:15 consultant 94:11 94:17 consume 68:21 consumption 118:19 contact 216:17 contagious 12:4 contained 78:10 144:6 contains 94:23 contaminated 78:22 79:20 96:19 147:21 contamination 77:25 78:3,20 79:16 81:14 146:18 172:14 continue 5:14 54:8 106:5,7 182:1 continued 22:8 continues 206:23 continuing 102:16 106:1 continuously 14:1 contracted 89:1 contractor 123:13 control 32:25 controls 207:23 conversation 162:2 171:2 172:10,21 175:22 conversations 5:9 171:9 172:4 cook 125:9,10 176:25 185:13 cooking 76:16 cookware 198:4 cooler 27:22 cooperative 207:9
---	---	--	---

[coordinator - deck]

Page 8

coordinator 11:15 11:18 copious 27:15,20 copy 9:20,25 29:8 33:5 64:8 85:21 89:23 91:12 92:24 99:13 143:12 145:8,10 153:25 159:17 160:21 173:13 corn 187:18 corned 187:20 corporation 1:9 5:22 correct 37:17 38:12 67:16 78:11 96:5 106:21 153:9 160:1,2,5,6,8 161:1,2,7,16,17 166:11,12 169:21 178:5,6 correcting 158:22 correction 222:4 corrections 220:4 cost 111:20,23 121:10,13 216:2 couch 142:17,20 counsel 5:18 6:13 10:12 35:12 80:9 100:22 171:5 217:21 218:8,16 218:19,24 219:3 counseling 14:11 14:20 counter 67:3 countertops 124:4 124:5,7 127:7 counting 163:8 country 205:14 couple 10:14 20:21 85:25	104:19 123:14 184:23 185:21 190:8 192:7 196:1 213:4 courses 104:7 court 1:1 5:24 6:7 8:10 courteous 212:24 courtney 73:11 cover 49:13 98:18 147:22 155:1 covered 103:18 110:13 covers 161:6 coworker 171:16 coworkers 36:12 cranberry 187:22 crawford 1:13 3:2 5:17 7:7,14 9:20 11:2,3,5,7 20:24 29:8 32:15 33:5 36:24 37:12 54:8 54:18,21 58:7 60:8,15 62:11 64:8 65:21 77:22 85:21 89:23 91:12 91:20 92:24 93:4 101:14,16 106:3 125:15 143:12,17 151:24 152:1 154:22 159:17 160:21 166:10 172:25 173:13 174:19,25 175:25 176:25 182:1 183:25 199:16,21 202:17 203:17 204:4 207:3 208:4 208:10 210:12 212:23 216:12 218:10 220:10	222:25 crawford's 204:22 cream 44:1 187:24 188:1 190:22 creams 44:1 creasote 211:3 crew 24:19 crisco 76:19 crisis 14:17,18,19 cross 3:4 213:2 ct 94:9,11,17 cucumbers 188:3 cuff 24:9 49:24 cup 215:18 cups 69:11 cured 188:7 current 12:24 106:13 141:7 currently 11:6 19:18 37:12 62:2 cv 1:6	dated 29:23 33:14 64:17 86:2 91:18 93:6 161:3 173:16 207:15 dates 111:7,9,11 daughter 18:14 131:20 179:23 180:6 daughter's 179:24 180:10 daughters 179:7 179:17 180:9 david 2:8 6:25 154:8,11 day 22:9 41:15 69:11 169:21 176:6 183:1 187:25 197:10 200:13 220:13 221:17 dayquil 67:2 days 17:5,6 66:25 102:8 105:3,6 108:12 163:2,8 176:1 ddt 211:5 dead 75:11 deal 83:12 162:9 211:18 december 33:14 decided 18:13 24:19 26:6 48:13 112:17 decides 161:24 decision 13:1 deck 116:11 122:19,20 139:13 139:14,16,18 140:6 148:1 149:10 157:1,2,3,4 157:5,8,13,16,17
--	---	--	--

157:18,19,20,22 158:21 159:1 decks 122:20 declaration 4:2 143:16 144:7 deep 96:22 97:5,7 119:16 122:21 deeper 97:12 defendant 1:10 2:12 6:24 151:4 defendants 5:18 5:22 defies 204:25 define 35:9 defined 78:20 definite 163:1 degreasing 211:7 degree 101:18,19 101:22 102:3 104:12 dehumidifier 132:17,23 133:25 dehumidifiers 197:5,6 delay 99:3 delivery 105:8 dentist 204:9 dentists 205:24,25 deodorant 74:17 department 3:21 11:14 26:11 84:13 84:19 164:9 departments 148:7 depends 197:9 deponent 220:1 221:4,12 deposed 8:2 depositing 88:10 deposition 1:13 3:12 5:12,17,24	8:8 9:1,17 10:10 10:24,24 29:6 33:3 36:16 39:16 54:3 60:6 62:8 64:6 85:19 89:21 91:10 92:22 101:13 106:6,8 125:12 143:10 151:16,19,23 154:20 159:15 160:19 173:11 174:17 199:12 202:14 203:15 206:25 212:24 218:13 219:13,21 220:4 221:7 depression 41:5 des 66:9 description 3:11 30:5 33:16 34:20 desk 19:16 destroyed 162:13 detaches 142:24 detect 90:23 91:1 92:17 96:7 detected 166:22 detection 88:13 94:25 detergent 75:10 determined 79:20 204:15 develop 103:11 devices 54:14 dhea 68:3 diabetes 59:18 diagnose 104:4 diagnosed 40:3 44:17 47:18 diagnoses 46:16 46:19	diagnosing 104:2 diagnosis 46:25 51:9 61:9,12,19 diagnostic 46:4 diagnostics 103:24 diagram 156:21 156:23,24 157:24 diarrhea 45:7 diathermanous 74:24 75:4 dibenzyl 67:18 died 72:5 142:23 dieldrin 211:9 diet 37:13,21 69:15 dietitian 13:20 different 30:23 111:7 152:16 153:12 difficult 20:7,13 difficulty 30:16 dig 147:11,25 diminution 146:24 148:16,19 dining 139:6 141:16 dinner 37:3 dioxin 211:11 direct 3:3 7:10 directly 99:1 162:9 director 13:19 disagree 95:13 154:17 156:16 160:16 161:18 disciplined 28:3 discontinue 40:12 discontinued 43:2 discovery 10:11 32:16 80:8 180:24 199:5,17,18	215:24 219:14 discuss 63:22 217:19,23 discussion 64:4 65:10 175:19 218:11,16 discussions 64:1 65:2,17 87:7 218:1,7,17,25 dishwasher 124:24 125:1,3,6 127:19 182:3 dishwashing 75:9 disinterested 221:14 disorder 39:25 173:19 disposed 78:9 distress 21:24 79:12 district 1:1,1 5:23 5:24 disulfiram 66:11 diverticulitis 37:20,21 44:11,12 44:16,18,24 45:6 46:2 47:14 50:14 50:16,19 60:21 61:25 66:23 dizziness 48:8,9,20 48:22 49:1 dizzy 48:25 doctor 38:5 42:23 86:18 179:24 180:6 doctors 38:16 179:21 document 156:20 157:8 158:14 documentation 80:7
--	---	---	---

documents 10:11 111:11 153:4 213:22 214:2,11 dogs 189:25 doing 83:14 141:14 172:16 dollar 144:24 dollars 145:7 donna 115:12,18 170:3 door 22:6 128:10 139:9 140:17,18 142:8 150:12 201:17,17 doors 22:4 28:17 140:6,19 142:10 downside 204:16 downstairs 123:24 124:11,13,14 131:18,24 132:18 133:13 134:7,8 143:3 dr 3:18 38:6,10,13 38:16,17,21 39:3 40:4 47:24 48:1,7 49:6,21 55:5 60:17,20 62:25 63:5,12,19 64:1,14 64:19,22 65:2,17 83:3,6,19,21 84:1 85:5,8 86:17 87:7 87:25 175:7,19,22 180:3 drain 77:11 drawer 2:5 drawn 50:8 dried 188:11 drill 28:16 97:12 145:2,3 drilled 144:25	drink 68:23 69:3,7 69:9,11,13 78:17 108:23 109:3 169:4 176:10 193:8,9 194:25 215:16 drinking 95:2 148:9 176:19 drive 106:23,25 107:5,7,10 168:16 driveway 119:18 119:20,22 driving 174:3,4,15 209:20 drops 43:25 drove 209:19 drugs 66:22 103:19,21 183:14 drunk 108:20 dry 178:12 dryer 135:24 138:3,5,10,17,23 dsilver 2:11 ductwork 137:22 due 30:16 168:19 168:23 169:2 dug 122:3 duly 7:7 dumped 78:11 dumping 204:24 dust 150:9,10 212:21 duties 80:6,7 dyes 211:13	101:5 116:19 131:7 135:14 142:5 190:22 208:22 early 20:6 58:11 88:13,13 129:2 133:15 earth 74:24 75:4 easier 18:9 eat 70:9,20 118:7 139:7 181:8 183:16,18,22 184:2,23 188:16 189:2 192:11 194:19 196:3 editor 173:8 202:8 202:22,23,25 206:16 207:23 education 101:17 102:17 103:2 effect 35:24 214:10 effectively 24:24 effects 25:4 34:12 35:1 103:22 effort 166:23 eggplant 188:15 eggs 188:13 egress 117:16 eight 104:15,17 144:14 either 9:11 11:20 81:10 208:13 ejoselson 2:7 elbow 28:18,23 elbows 28:13 elderly 14:22,23 elected 171:25 electric 100:11,19 126:20	electrical 138:14 elevated 65:7 116:3 else's 164:22 emanuel 2:14,18 6:20,24 emergency 42:21 emily 2:4 7:2 170:11 emotion 4:12 207:17 emotional 14:19 emphysema 57:4 employed 11:6,9 175:25 178:7 200:11 employees 198:20 employer 35:14 103:5 empty 139:3 endive 188:17 endoscopes 46:25 endoscopies 46:11 46:21 endoscopy 46:23 enema 53:12 enemas 53:21 engaged 196:7 enjoyment 147:2 149:2 entail 19:12 entering 33:17 entertain 165:22 166:1 entertainment 166:4 environment 33:1 environmental 83:11 epipen 32:7,9,18 32:20,23
	e 2:1,1,7,11,16,20 3:10 7:21,23 68:1 68:1 104:21 222:1 222:1,1 earlier 31:1 34:7 55:16 88:17 98:13		

episode 44:20,21 equal 80:10 equipment 122:23 errata 220:5 error 153:1 eryzole 67:24 68:1 escitalopram 40:23,25 41:2,7 57:20 esophageal 56:24 57:2 73:7 esq 2:4,8,14,18 estate 159:21 163:10 164:20 estimate 97:21 121:18,19 123:11 estrace 58:3 et 1:3 5:19 222:2 evacuated 205:16 event 221:14 eventually 24:13 evergreen 106:23 106:25 107:5,7,10 everybody 80:9 150:23 172:23 evidence 85:18 180:25 199:6,19 evolve 103:10 exact 213:25 exactly 82:9 135:5 135:18 153:13 examination 3:3,4 3:4 7:10 213:2 216:15 examine 60:23 examined 7:8 example 100:17 examples 12:23 excuse 48:21 95:21 132:24 197:4	exercise 17:9 71:1 exhibit 3:11,11,12 3:13,14,15,16,18 3:19,20,22,23,24 4:1,2,3,4,5,7,8,9 4:10,11,12 9:17,21 29:6,8 33:3,5 54:3 54:18,19 60:6,8 62:8,11,15 64:6,8 85:19,21 89:21,24 91:10,12 92:22,24 125:12,15 143:10 143:13 151:19 153:25 154:20,22 159:15,18 160:19 160:22 170:4 173:11,14 174:17 174:19 202:14,17 203:15,17,24 204:4,10 206:17 206:25 207:3,7,10 213:5,17 214:24 215:5 exhibits 204:2 exist 205:23 expanded 172:14 expanding 81:13 172:19 expense 216:5 expenses 169:1 215:23 expensive 113:5 experience 164:25 experienced 25:4 26:19 174:12 experiencing 30:8 30:11 expert 83:10,19 88:5,11 95:16 96:18 202:2 205:22	experts 79:4 83:16 88:8 201:16 expires 220:20 221:23 exposed 26:24 27:2 33:1 35:1 43:22 79:1 83:11 84:2 196:23 209:22 212:1 exposure 24:18 26:21 28:7 44:4 85:17 87:20,22 208:12 exposures 24:17 25:24 28:8 88:12 extended 146:1 extent 32:13 exterior 121:3 158:18 extra 83:14 121:15 130:13 131:5 158:8 194:2 extract 68:5,7,9,11 68:13,19 195:16 extremely 20:15 eye 43:25	fair 80:10 214:24 217:7,11 faith 95:24 fall 23:25 184:22 fallen 122:1 174:2 174:4,14 falls 54:21 81:4,5 81:24 familial 73:5 family 11:21 14:13 38:5 56:12 73:2,4 73:5 83:9 109:17 131:20 156:2 166:2 family's 81:10 fan 138:22,23 far 108:3,4 132:13 136:18 204:11 farm 146:4,5 farther 81:18 fast 20:12 30:10 183:16,18 father 56:24 57:2 71:5 72:6,14 fatty 61:6,9,17 faucet 137:17 favorable 201:19 february 62:20 155:1 156:11 fed 17:9 federal 173:6 fee 117:5,6 feed 17:11 feel 14:6 48:25 149:6,11 164:4 feeling 45:5 feet 23:22 96:24 96:25 97:3,5,10 122:22 felt 81:6
		f	
		f 2:8 6:25 fabric 76:11 facebook 202:7,7 facilities 19:15 54:24 103:1 facility 13:8,21 15:24 16:14 17:14 17:22,25 18:5 26:1,4 34:17,25 167:13,15 168:3 168:10,16 173:24 facing 135:6 facts 10:17	

fences 114:7	fireplace 109:11	floors 30:14,21	forward 23:25
fenofibrate 40:5,8	159:3	34:1 110:3 124:18	219:14
40:12 41:10 57:22	firm 6:5	flower 118:10,12	found 44:14 51:15
fertilizer 75:22	first 8:5 10:6 21:5	122:6	foundation 75:6
205:11	21:16 26:21 28:6	flowers 177:10	119:13,16
fever 44:22	35:7 41:22 44:20	flu 12:5,6 55:20	four 12:18 24:24
fevers 45:8	44:20 50:12 61:12	fluoridate 205:10	25:14 68:24 73:9
fexofenadine	61:24 80:13,15,18	fluoridated 201:2	88:22,24 92:12
57:24	80:23 81:2,22	201:4,22,24	114:16 122:22,22
fiberglass 211:15	82:2 86:12 91:15	202:10	152:6 153:4
fibrocystic 52:2,4	93:2 94:7 110:5	fluoridation	186:22 191:18
fiddlehead 188:19	115:4 122:8	204:16 206:1,15	fourth 90:17
field 88:11	126:11 144:1,2	fluoride 43:13,14	frame 50:17
figs 188:21	146:2 152:7	43:22 44:5,8,14	108:24 113:9
file 22:16 23:8	154:25 171:14	201:20 204:20,24	framing 142:10
28:21 35:13 200:6	199:23 200:11	205:6,9,17	frankfurters 70:8
filed 5:23 21:13	203:5	fluorine 58:17	free 4:11 117:2
22:23 23:17 28:15	fish 70:14,16	flying 75:7	149:6 184:11
filings 21:16	188:23	follow 216:13	203:13
fill 30:1,1 42:3	fit 12:1	followed 29:5 73:5	freezer 133:3
48:17 137:1,6	five 13:13 60:10	following 94:13	french 62:6
149:16,17	100:23,23 109:25	follows 7:9	fresh 146:8 185:9
filled 30:3 148:11	128:20 134:13	food 69:19 183:16	194:19 209:24
148:12	136:12 176:3	183:18 184:3	fresheners 77:17
filter 89:18	179:16 181:10	194:2	208:21
financial 155:7	201:8	foods 183:25	fried 191:17
financially 6:11	fix 117:3	footage 110:10	friend 215:15
find 81:19	fixture 140:1	foregoing 220:3	friends 81:5,23
finding 164:13	flagyl 66:19,24	221:10	82:3,5 131:21
findings 51:24	flavoring 195:14	forgot 40:13 45:24	frigidaire 125:4
52:12 53:5	flip 9:23 85:24	form 4:8 112:23	front 24:1 29:9
fine 9:1 10:6 11:4	floor 21:25 24:20	119:3 167:16	33:6 85:22 91:13
22:15 65:14,19	28:5 30:20 31:1	172:2 177:6,19	92:25 113:23
81:7 98:11	76:7,9 110:5	196:7 204:2	114:2 118:15,16
finger 23:4	129:24 133:23	209:15 214:3,12	125:15 143:13
finished 110:7	138:7 142:21	214:17 215:1	145:22,25 146:13
fire 28:16,16	flooring 124:10,16	216:8 217:4,9	147:12 154:22
146:15 162:13	127:21,23 128:1	formal 197:13	159:18 170:4
216:10	129:8 130:15,16	formed 201:7	173:14 202:17
firearms 196:17	131:24 134:8	formica 124:9	203:17 207:3,7,10
	139:23,23 141:5,7		

[fruit - ground]

Page 13

fruit 118:7 187:6 189:6,8,9 fry 188:25 full 7:12 75:11 88:14 150:9 221:10 fully 162:11 fumes 24:23 25:5 25:21 26:13 function 49:15 65:14,19 furnace 112:15,16 112:20 113:11,16 125:6 135:23 136:2 159:6 furnished 120:1 furniture 197:24 further 85:8 145:1 221:7,13 fuse 138:14 fuses 138:15 future 87:21	garrison 170:23 gas 69:21,23,24 209:7,9,11 gasoline 183:9 gastro 47:3,6 gastroesophageal 39:25 gastroesophagitis 47:2,9 gather 80:7 gee 83:17 general 21:25 77:22 78:5,14 79:7 80:5 generally 17:11 183:20 189:13 191:3 gerd 39:23,24 40:1 40:3 46:24 47:1,6 47:8 71:25 74:5 192:17 geriatric 105:17 getting 43:22 53:4 53:16 gilbert 62:5,6 gilbert's 61:20,21 62:3 gin 189:11 ginger 68:5 ginkgo 68:7 ginseng 68:9 give 9:13 36:14 95:10 121:18 given 8:2 221:11 gives 114:5 giving 19:13,14 glass 68:24 113:9 176:17,18 glasses 54:15,16 globe 132:22	gloss 24:21 go 5:15 9:22 11:2 12:12 27:21 53:24 60:11 103:4,8 105:19 119:16 137:1 138:20 139:9 157:18 167:13 169:8 178:14,16,21 179:8,15,21,23 180:14,17 181:4,5 181:6,9,18 183:20 183:23 198:12 200:8,10 210:17 213:18 gobain 1:8 5:21 6:21 78:4,6 94:12 94:17 171:10,12 171:15,25 173:4 222:2 god 82:17 95:23 goes 138:18 180:3 206:14 going 5:6 8:15 14:17 22:6 32:11 37:8 54:1 74:8 82:15 96:11 101:8 105:22 107:23 117:8 126:2 147:11,24,25 150:6,13 151:12 151:15 157:4 163:1,3 184:1 201:13 205:6 219:20 good 5:5 6:19 53:17 105:19 106:3,4 117:2 151:11 goodfellow 155:10 155:13	gordon 170:23 gore 198:2 gosh 45:18 gotten 146:3 gout 59:1 government 171:24 172:9 173:3,6 grabbing 29:1 grade 110:5,5 gradually 205:7 graduating 102:13 graham 60:17 grandville 104:23 105:2 granola 189:17 grant 146:4 granville 108:14 grapes 189:15 grass 114:2 119:8 122:2,4 gravel 119:23 great 45:4 green 77:3,5,5,6 189:19 greens 187:12 188:19 191:1 grid 100:14,15 grieve 214:18,22 215:4 216:24 217:12 grieved 214:6 217:13 grieving 217:15 grocery 82:4,18 ground 78:12 98:20 120:9 136:19 157:20 158:21 188:25 204:24
g 17:18 30:7 gaige 1:14 6:7 8:10 221:2,21 game 131:22 132:13 garage 110:12,13 110:13,15,24 111:1 117:14 119:18 121:15 122:24 182:11 183:9,11 210:18 garden 117:22 118:2,8 136:22,23 137:3,7 149:13 gardens 118:10,12 122:7 garlic 68:11,13 189:4			

grounds 26:12 groundwater 146:18 group 201:14 203:11 grow 104:24 149:6 grown 122:2,5 grows 119:8 guard 30:7,19,25 31:10 guess 100:12 217:11 guests 130:14 gutters 159:7 gyn 38:19,21,25 39:1,4,8	hanover 179:13 happen 27:6 48:13 49:2 82:15 happened 27:2 152:11 172:21 harassment 35:12 35:14,18 36:1,20 hard 69:5 hardwood 124:17 124:18 129:8 harsh 33:2 hartford 162:5 hatchway 137:2 hausthor 170:21 hazard 205:15 head 8:17 110:20 headache 25:9 26:17 27:5 headaches 30:13 health 3:21 84:12 84:19 87:20 164:9 hear 22:8 80:18 heard 8:9 79:25 80:15,22,23 81:2,3 81:22 82:2,20 171:14 194:17 heater 132:22 137:25 heavy 99:18 held 5:25 21:11 help 18:19 24:11 48:25 150:23 197:11 helped 14:15 helpful 47:12 helping 22:7 hemingway 203:6 203:20 hemmingway 203:12	herbal 187:14,16 herrick 7:19,22 high 40:11 41:23 63:9,13 104:13,14 104:17 175:14,20 216:21 higher 96:20 highest 101:16 highway 209:19 209:21 hire 123:1 history 12:24 56:13 57:6 73:2 175:15 hit 28:18 81:25 hives 25:7,13 26:17 27:4 30:12 43:12,15 hmm 17:21 19:8 21:6,19 28:2,24 29:12,19 31:13,16 36:11 40:20 42:11 52:5,19 53:19,19 55:15,17 57:7 61:16 70:23 73:23 87:1 98:15 99:2 109:7,10 110:18 113:8 127:18,20 130:17 131:10 134:25 136:6 137:24 141:1,18 142:7 148:18 149:4 154:3,16 158:7 170:7 172:6 177:25 180:15 184:5 193:21 197:2 208:23 219:4 hobbies 196:7,14 196:17,19 197:14	hold 146:6 201:15 holding 98:24 holiday 192:11 holidays 166:1,5 home 4:1 11:12,21 11:22 12:13 13:24 15:15,17 16:5,9,17 16:20 18:14 20:9 22:24,25 23:3,20 24:16 26:6 28:10 28:14 42:20 49:24 69:22 73:22 76:4 77:9 80:17 107:5 107:6 108:9,15 109:17,21 111:6 111:16,20,23 112:4,5,16,18,20 113:21 126:5 152:1 156:3 161:10 164:18 165:22 167:9 168:15 176:1,10 176:12,14,20,24 178:4 181:11 196:25 200:12 208:20 home's 100:7,10 homeowners 161:21 162:17 homes 79:12 honey 189:21 hook 146:3 hooked 78:18 116:15,16,24 hookup 146:11 hoosick 54:20 81:4 81:5,23 horseradish 189:23 hose 137:4
--	--	---	--

hospital 12:14,17 18:23,24 19:7,10 20:1 21:3 22:3 44:9,10 105:6 177:24 209:9 hospitalized 47:15 61:24 hot 189:25 hour 53:17 151:13 hours 9:5 176:4 house 10:18,20 74:9,11 78:19,22 81:20 96:12 98:7 99:1,4 100:20 107:4 112:21 115:1,2,16,19 117:9,14,16 118:16,17 119:13 120:24 121:3,12 122:9 123:20 124:10,12,16,23 129:6,8 131:3,17 132:19 133:12 134:1 135:22 139:5 140:16 141:23 142:3,11 142:16 145:22,25 146:2,11 147:9,16 148:20 149:9 150:9 152:4 153:8 155:8 156:6,25 157:2,16 158:18 159:3,8,13 161:13 162:11,14,19,21 162:23,25 163:6 163:11,14 166:4,7 166:10,16 182:22 209:25 212:9 214:25 215:14 household 161:24	houses 78:19 huh 163:8 humid 197:10 humidifiers 196:25 197:1,3 hurt 18:12 21:21 23:21 hus 145:14 husband 76:21,22 118:5 121:6,25 122:3 123:2,12 126:10 136:21 140:25 145:14 161:9 162:1 163:1 179:4 180:18 183:12 husband's 111:2 hydrant 146:13,15 149:19 216:10	impression 61:3 83:25 improper 199:7 199:10,13 improperly 78:13 improvements 112:17,18,21 inaccurate 157:25 inactive 19:21 inappropriate 199:25 200:2,4 incident 3:13,14 23:6,6 25:23 28:19 29:4,10,13 30:5 33:7,16 incidents 25:24 include 35:4 172:19 included 81:21 99:17 includes 150:24 including 146:20 204:21 income 166:13,15 inconvenience 147:4 149:23 incorrect 174:4 increase 83:22 84:2 160:9,12 increased 73:1 increments 121:6 205:8 incurred 169:1 215:23 index 3:1 34:11,19 indicate 95:5 indicates 160:3 indication 175:14 individual 151:3 individually 1:4 5:19	individuals 115:15 infection 47:21 59:6 infiltration 61:6 61:10,17 info 31:10 information 13:2 32:14 37:1 informational 172:7 infrequently 184:7 inhaled 43:23 inhaler 60:2 inhalers 43:25 injectable 209:10 injections 56:3 injuries 24:15 28:12 injury 22:21 23:11 23:13 28:25 151:5 inpatient 13:21 inquired 33:25 inquiries 32:14 inquiry 11:19 insect 74:19 insects 74:21 75:7 75:12,20 inside 75:8 117:15 118:24,25 123:19 install 124:24 125:1 installed 89:18 99:6 113:11 129:11,15,18 132:8 133:14,18 134:11 instruct 218:6 instructing 218:14 insulation 196:23 211:17
	i		
	ibuprofen 58:20 icu 21:25 idea 23:24 99:16 100:5 204:23 identification 9:18 29:7 33:4 54:4 60:7 62:9 64:7 85:20 89:22 91:11 92:23 125:13 143:11 151:20 154:21 159:16 160:20 173:12 174:18 202:15 203:16 207:1 illness 12:24 imagine 207:23 immediately 16:18 important 87:13 87:15 88:7 impossible 204:22		

insulin 59:20	issued 101:22	189:8 199:3,10,17	126:23,25 127:12
insurance 161:21	issues 58:8	199:22 200:3,7,17	127:14,17,21,24
161:25 162:14,16	iv 17:18 44:13	200:22 201:25	128:4,8,17 141:20
162:17	ivey 204:6,8,12,15	202:12 203:23	142:6 182:4
insured 162:11	206:8	205:4 206:23	kitty 182:20,24
intend 116:16	j	207:5 209:16	knees 28:12
intentional 27:17	j 2:4 73:11	213:3,11,16,20	knew 177:7
intentionally	jacuzzi 123:7	214:7,13,20 215:3	knight 170:25
27:19	james 1:3 5:19	216:11 217:4,9,21	knock 47:10
interested 6:11	31:20,21 38:1,4	217:25 218:5,14	know 8:23 12:6
interfere 5:12	55:4 62:18 170:15	219:6,11,15	20:22 21:22,23
199:11	jasmine 190:2	judge 32:15	22:5 25:17 26:11
interference 5:10	jersey 95:19 96:4	juice 184:15	27:15 28:22 31:23
199:23	jet 97:2	191:13	34:9,21 36:7
interpret 99:21	jim 170:17	july 3:20 86:2	55:18,20 71:23
interruption 20:11	job 11:13,22 14:8	112:3 178:23	73:4 74:10 77:4
182:8	15:16 16:24 17:2	june 3:24 93:6	81:6 82:9,15,22
intramuscular	21:5	159:23	83:9,12,16 84:5,25
17:20	jobs 200:15	k	85:2,10 87:15
intravenous 15:11	john 39:2	k 7:23	88:9,12 89:5
investigating	johnna 73:11,15	kale 190:4	95:20,25 96:10,16
30:17	join 198:13	keep 5:11 81:18	96:18,22,25 97:3
investigation	joined 200:11	101:6 148:8	98:5,17 99:19
95:21	joining 201:21	keeping 103:12,13	103:5,10 110:11
investment 144:19	joselson 2:4 3:4	125:23	111:6 115:5,18,22
144:22	7:2,2 9:24 22:12	keeps 117:8	115:23 116:1,3,5,7
involved 35:8	32:11 36:4 37:8	kept 22:6 81:13,15	119:5,8,8,10,17
36:21 81:12	43:10 45:17,19,22	81:20	121:7,8,10 122:5
198:14 217:15	46:13 49:10 50:20	kidney 65:13,18	123:11,15 126:13
involvement	51:11 53:16 59:7	kidneys 63:2,6	136:20 138:1,13
201:23	59:12 65:23 67:14	88:10	139:2 142:19
involving 196:14	82:8 84:4 88:4	kids 20:18 104:19	145:4,6 147:20
196:17,19 201:1	91:2 95:8,15	kiin 6:4	148:24 149:7,9
irrelevant 180:23	107:17 108:3,11	killer 75:17	150:21 153:12,14
irritate 192:19	108:13,24 112:23	kills 75:2	153:17 154:13
island 178:20,22	117:20 119:3	kind 28:21 58:15	162:6 163:2,20,22
179:18 180:8	125:18 136:5	81:7 121:6 125:3	167:2 168:9
isolation 11:25	151:12 166:25	150:13 172:22	169:23 170:1,17
12:3	167:16 171:4	208:6	170:19,21,22,22
issue 44:5 162:10	172:2 177:6,11,19	kitchen 89:9 124:3	170:25 172:7,8
	180:20,23 181:25	124:7 126:12,15	174:3,7 176:8

184:2 196:22 199:14,17 200:2 203:9 207:22 208:11 210:16 211:18,19 216:22 217:15 219:6 knowing 149:8 knowledge 120:8 144:6 151:9 177:21 196:24 208:25 209:2,10 209:14 210:5,7,9 210:11,23,25 211:10,12,16 212:6,14,18,20,22 known 5:12 150:18 211:24 knows 85:12,13	100:25 101:4,15 105:19 106:2 107:20 108:5,8,18 109:1 110:22,23 113:2 117:21 119:6 125:11,14 125:19,20 136:7 151:11,25 167:3 167:19 170:11 171:6 172:5 174:8 177:9,13,22 180:21 181:1,2,18 182:10 189:9,10 199:7,8,11,15,20 200:1,5,8,9,18,25 202:5,16 204:3 206:4 207:2,6 209:18,23 212:23 213:1,5,13,19 214:3,9,12,17 215:1 216:8,12,16 217:6,22 218:3,9 218:20 219:5,9,12 219:17 lamp 75:8,10 142:22 land 113:20,20 114:4,7,17 117:10 118:20,22 119:2,7 166:20 landscaping 121:22 122:12 langrock 2:5 langrock.com 2:7 large 133:1 136:9 136:14 lasix 66:13 lasted 20:16 late 124:6 132:9 latent 79:2 83:17	laundry 75:24 lauren 115:14,18 170:2 law 35:2 104:3 lawn 113:23 115:1 118:15 122:6 177:5,7 181:16 182:11 lawnmower 111:2 lawsuit 35:8,9,13 35:21 36:14,22 77:23 layout 156:25 lead 156:1,7 180:24 199:5,18 211:20,21,24 212:2 leadership 198:21 leaking 120:20 learn 30:18 80:13 103:8 learned 149:25 leave 16:14 18:10 33:21 114:6 179:19 180:12 181:8 219:12 leaving 179:17 left 20:1,6 57:18 62:17 115:10,11 122:2 128:10 131:14,22 132:2 132:21 133:24 135:25 136:13 137:9 138:22,25 142:19 157:7 170:15 174:22 legal 6:4 102:25 leslie 170:17 letter 3:18,19,20 3:23,24 62:18 64:14 91:15,22	93:2 202:25 203:3 206:16,18,21 letters 173:8 202:8 lettuce 190:6 level 86:18 95:13 96:15 101:17 110:6,8 119:25 129:6 144:17 158:4,22 levels 95:6 license 19:19,23 21:10 102:4,7,11 102:16,17 164:20 licensed 15:5 licenses 21:11 lidex 44:1 life 183:6 light 140:1 liked 202:3 limited 146:21 limiting 48:14 limits 53:7 94:25 99:10 linda 1:13 3:2 5:17 7:7,14,19,19 45:20 54:21 60:15 63:2 93:3 101:14 143:16 151:24 174:25 208:3 213:4 220:10 222:25 line 63:8,16,23 65:13 155:22 174:9,9 202:13 206:24 222:4 lines 92:12 120:3,6 147:15 150:13 linoleum 127:22 141:8 lipitor 56:5
I			
I 39:2 66:15 68:1 104:21 115:14 I.I.p. 2:5 lab 12:15,24 18:4 18:7 85:6 94:21 94:23 labor 198:14 200:14 laboratory 16:6 94:24 104:8 lafata 2:18 3:3,4 6:19,20 7:11 9:19 10:3 20:23 22:14 32:17 36:8 37:11 43:16 45:23,25 46:15 49:12 50:22 51:14 53:19,20,23 54:7 55:9 59:9,14 60:11,12 62:10 65:25 67:16,17 82:11 84:7 88:16 91:5 95:12 96:2			

liquid 67:3 209:15 liquids 75:2 liquor 69:5 189:13 list 183:25 listed 55:13 72:10 164:22 215:5 listen 45:19 liter 86:10,14 93:25 95:1 96:3 litter 182:20,25 little 27:14 81:3,18 97:13 100:23 122:6 128:12 139:6 196:2 205:7 littleton 179:11,12 live 73:19,20 81:5 104:20 107:10 115:15 165:6 167:9 168:15 179:7 181:10 218:3 lived 106:15,19 108:19 109:4 126:23 168:1,4 liver 49:15 61:6,10 61:17 88:11 lives 73:21 115:2 215:20,21 living 142:1 150:2 llp 2:14,18 load 76:14 lobster 190:10 local 198:22,24 located 6:2 118:14 140:16 location 157:10 lodged 22:6 logic 204:25 long 9:1 32:9,18 40:1,7 41:2,14 66:24 72:11 100:6	101:5 106:15 183:5 199:2 201:5 longer 39:12 98:3 149:15 look 12:22 88:12 91:9 98:18 103:22 156:23 looked 10:15 looking 10:23 133:9 looks 126:15 131:22 158:2 lose 125:24 loss 58:24 147:2 149:1 lost 42:18,19 78:21 lot 16:21 23:7 27:13,24 36:6 107:23 122:4 147:14 150:11 197:16 loud 8:16 low 112:13 144:17 216:20 lower 68:18 96:21 157:19,19,20 159:1 lunch 105:20,23 106:11 217:18 218:11	210:16 maintenance 98:9 116:20 122:14 major 122:11 125:5 making 196:15 malaise 45:8 male 94:9,11,17 mammogram 51:25 52:1 mammograms 51:17,20,22 53:9 man 23:21 81:8 97:3 204:5 mango 190:14 manmade 78:7 manufacturing 78:8 maples 114:14,15 march 161:3 margarine 190:18 marjoram 190:16 mark 125:11 marked 9:17 29:6 33:3 54:3 60:6 62:8 64:6 85:19 89:21 91:10 92:22 125:12 143:10 151:19 154:20 159:15 160:19 173:11 174:17 202:14 203:15 205:15 206:25 market 163:14 185:9 214:25 217:11 markings 203:25 married 104:19 107:3 mary 18:24 19:2 20:1,6 21:2	177:23 master 129:24 140:11 material 34:10 168:12 mati 6:4 matter 5:18,22 mccllellan 18:24 19:2 20:1,6 21:2 177:23 mcdonald's 183:21,22 mclellan 39:2,3 mcmuffin 183:24 mean 12:3 14:18 20:14 86:23 90:23 92:17 95:18,19 98:16 136:23 145:24 147:8,9,10 147:18 148:21 149:5,24,25 150:20 171:4,21 202:6 206:7 209:16 214:16 means 21:23 meant 20:15 measurement 85:3 meats 188:7 med 44:13 media 5:16 101:8 101:13 106:1 151:16,23 219:19 medicaid 14:15 medical 3:15,16 3:19 4:9 11:23 12:8,21 14:18 16:10,12,17,25 17:4 18:11,22 20:3 21:17 22:18 23:8,18 24:4,16 25:20 27:8,10
	m		
	m 39:2 mace 190:12 machine 136:9,11 madeira 195:1 madison 2:15,19 mail 2:7,11,16,20 mailed 161:9 main 1:17 2:9 6:2 maintain 102:17 122:25 139:21		

28:21 31:21 32:14 34:17 37:1,12 42:21 47:17 54:14 64:12 71:5,12,24 73:14 74:4,6 78:25 79:4 83:15 85:16 88:8 102:16 104:7 173:20 174:23 178:2 180:10,11 medication 15:8 17:13,17 19:11 20:24 40:5,15 41:6,9 47:3,10,12 48:23 49:3 58:8 58:12,24 59:15,18 65:22 66:3 67:3 medications 9:4 15:3,6,12,14,18,21 17:6,21 19:13,14 32:4 42:4,7,13 43:7,9 57:16 59:5 103:15,15 medicinal 60:2 meet 11:23 12:13 12:16 13:6 80:8 168:6 meeting 172:21,22 172:25 201:17 meetings 172:8 198:12 201:15 melinda 73:11 member 11:21 198:6 200:13 members 13:5 150:19,24 171:24 201:14 memory 208:1 men 148:6 menopause 53:4	mention 40:13 149:22 mentioned 26:22 28:6 39:17 41:25 44:16 46:7 55:16 72:25 84:10 88:17 96:5 126:17 127:8 129:10 163:17 216:2 mercury 212:5 mess 147:25 message 62:23 met 115:3 171:12 172:8 metal 196:12 metals 99:18 meter 100:19 mic 85:1 michael 38:15 michelle 115:4 micrograms 85:1 86:10,14 microphones 5:8 5:11 mid 44:19 middle 55:10 61:2 64:22 94:20 138:2 143:15 158:20 160:3 175:11 middlebury 2:6 miles 108:4,15 181:10 205:16 milk 188:11 190:20 milligrams 85:2 mind 125:23 mine 126:6 143:22 176:24 mineral 205:18,19 minutes 100:23,24 105:7	misquamicut 178:20 missing 120:23 mistake 217:2,8 misunderstood 215:2 mix 24:22 mm 17:21 19:8 21:6,19 28:2,24 29:12,19 31:13,16 36:11 40:20 42:11 52:5,19 53:19,19 55:15,17 57:7 61:16 70:23 73:23 87:1 98:15 99:2 109:7,10 113:8 127:18,20 130:17 131:10 136:6 137:24 141:1,18 142:7 148:18 149:4 154:3,16 158:7 170:7 172:6 177:25 180:15 184:5 193:21 197:2 208:23 219:4 model 196:20 mold 75:15 money 35:25 148:21 monitoring 78:25 79:4 83:14,15 85:13 88:8 month 12:18 180:7,16 183:19 186:6 187:3,19 188:8,14 195:13 monthly 184:10 186:14 189:20 191:4,12 192:5 193:12 194:24	months 20:17 81:25 126:14 191:18 196:4 moore 60:17,20 175:7,19 mopped 30:14,22 morning 5:5 6:19 75:11 mortgage 111:10 111:24,25 112:2 mortgages 112:5 mortgaging 155:9 moss 1:16 2:9 6:1 moth 183:7 mother 56:20,22 71:9 72:8,14 105:5 mother's 142:22 motion 143:17 200:6 move 81:17 98:18 106:17,22,25 205:5 moved 38:18 105:1 107:3 115:3 122:1,8 127:5 128:13,20,24 moving 81:19,20 96:10 101:6 mower 182:11 mri 51:5,7,9 mr 51:3 msds 34:10,11,16 34:19,21,23 municipal 44:2 78:18 116:12,24 145:20 munsom 6:1 munson 1:16 2:9 muscle 58:15,18
---	---	---	---

[mushroom - objection]

Page 20

mushroom 188:1 mushrooms 190:24 mustard 186:3 191:1,3 muted 5:11	nearby 168:2 necessary 59:5 neck 22:21 23:11 23:13 25:7,13 26:17 27:4 30:12 30:13,17 33:18 nectarines 191:5 need 8:25 19:15 24:4 28:23 78:17 78:24 79:4,11 97:24,25 129:13 139:20 148:3 needed 17:10 18:13 21:25 47:25 48:5,6 80:8 112:14,15,16 121:8 needs 11:23 12:2 13:7 17:12 negative 172:18 neighborhood 147:14 150:7 165:6,9 neighbors 96:10 96:20,20 115:6,11 115:13 170:2 never 20:18 28:20 57:12 117:3 174:2 174:2,3 194:17 217:14 new 2:15,19 6:6 18:24 20:1 21:3 34:1 54:21 73:20 81:24 82:3 83:20 95:19 96:4 97:1,4 97:9 104:23 105:2 112:16,25 113:6 116:18 123:9 124:4,11,24 125:1 125:9,9 126:17,18 127:7,19 129:14	129:17 130:3,4,6 135:8 144:24 150:7 160:7 177:24 179:7,10 179:18,22,23 180:3,9,14 181:10 newborn 20:10 newer 103:19,19 103:20,20 nice 106:11 150:9 nickel 212:7 night 40:14 41:1 nod 8:17 41:17 43:3 110:16 111:12 122:15 124:15 128:2 146:16 165:19 166:17 non 57:10 76:15 90:23 91:1 96:7 nonstick 76:15 197:25 198:4 nook 139:6 normal 53:7 99:10 north 79:18 80:25 81:8 108:4 northside 168:16 northwest 108:7 nosey 37:4 notary 7:5,8 220:17 221:22 note 5:7 203:23 notebook 34:24 noted 181:1 205:22 220:5 notes 12:25 notice 1:14 3:12 4:5 noticed 30:13 noticing 6:18	november 60:23 154:6 175:3 number 5:16 60:9 79:9 101:9,13 106:1,24 144:3,15 151:16,23 172:17 219:19 numbers 64:20 116:4 148:21 nurse 17:1,14 19:11 22:7 nurses 13:18 104:3 nursing 13:19 17:6,7 19:18,23 21:10 101:18,20 102:3,4,6,11,16,25 104:1 105:10,11 105:15 178:9 nutmeg 191:7 nuts 185:24 193:15 ny 2:15,19 nyquil 67:2
n n 2:1 73:11,11 nail 77:19,19 name 6:4,19 7:12 7:16 19:1 26:22 31:3 44:14 49:2 60:15 71:19,21 77:4,6 88:25 97:15 107:21 115:22 155:14 162:6 170:15 171:14 174:25 175:5 204:5 named 221:4,15 names 73:10 115:4 208:10 nanograms 93:25 94:25 96:3 narrow 128:10 nathan 2:14 6:23 nathanwilliams 2:16 natural 75:3,12 76:14 77:3 204:20 205:6,18 naturally 204:20 nature 36:24 37:5 119:22 nausea 20:25 44:13 nauseous 20:15 nd 90:21 92:15 near 157:14,15 210:17	o o 68:1 73:11 oath 6:10 7:6 205:24 ob 38:19,21,25 39:1,4,8 object 37:8 112:23 119:3 136:1 167:16 172:2 177:6,11,19 204:2 214:3,4,17 215:1 216:8 217:4,9 219:15 objecting 218:4 objection 32:12 36:4 43:10 49:10 51:11 84:4 88:4		

91:2 95:8,15 108:11 166:25 177:11 181:1 199:7,12,13 200:1 200:6,17,22 201:25 202:12 205:4 206:23 214:12 objections 6:16 obtain 19:23 101:19 102:11 obtained 101:17 102:3 obtaining 104:12 obviously 35:3 129:13 occasionally 19:17 181:9 occasions 179:19 180:12 occupations 177:18 ocean 204:21 october 3:23 91:18 91:23 offered 14:11 80:2 office 27:23,25 84:19 129:22,23 130:2,7 165:12 offices 1:16 5:25 officials 171:25 oh 10:14,17 12:20 13:10 22:25 35:6 45:18 58:19 68:14 74:25 82:17 83:17 95:22 108:22 110:21 115:25 125:19,25 126:15 132:24 134:23 142:22 167:21 171:18 194:19	197:4,6 199:1 201:3 216:7 oil 113:13,15 139:20 159:6 194:8 okay 8:19 10:9,13 11:5 12:8 23:12 30:4 34:24 39:8 39:14 40:15 42:13 45:22 46:10 50:23 54:18 55:20 56:10 58:15 60:23 61:2 65:7,11,13 66:5 70:10 72:13 81:3 82:24 89:24 92:9 92:12,19 97:19 100:19 104:16 108:6,13 110:8 120:11 121:21 126:11 127:19 132:15 133:4,11 137:6,15,21 138:2 138:17 139:4 140:21 141:19 143:23 145:13,17 151:10 153:25 155:10 156:13 157:16,22 158:1,2 158:13 159:3 164:5 170:23 174:1,5,14,22 198:14 203:2 204:10 208:3,14 211:20 212:15 213:8 215:4 219:4 old 45:24 97:2 98:5,17 105:1 108:12 136:11,16 138:5 171:20 olives 191:9	omeprazole 9:8,11 39:17,19,20 47:5 58:1 once 5:13 47:25 70:5 123:11 127:3 152:15 178:17 180:7,16 186:6,18 187:3,19 188:8,14 189:3 191:18,22 195:25 196:3 ones 83:2 154:12 208:22 ongoing 64:4 103:1,2 121:9 onions 191:11 onsite 103:3 oops 59:13 open 148:8 167:20 167:21 168:16 219:12 opened 150:8 operating 146:5 167:10,21 217:8 operation 178:10 operations 171:20 operative 175:3 opinion 88:5 95:16 option 145:20 oral 15:14,17 17:18 orange 191:13 209:3 oranges 191:15 order 4:8 126:1 ordered 19:13 organization 198:10 201:1,6,11 organizations 198:6 200:14,20 201:23	original 79:6 97:7 127:17 128:1,15 130:2,15 139:18 139:23 140:4,6 142:11 143:6 152:9 orthopedic 39:11 39:13 outcome 6:12 35:21 45:3 201:19 201:20 221:14 outdoor 118:24 outpatient 52:17 outside 25:22 75:5 76:21,23 110:15 110:24 135:6 138:20 140:17 159:12 166:10,15 179:6 209:25 215:20 oven 77:13 owned 183:5 owner 97:17
p			
p 2:1,1 104:21 p.c. 1:17 2:9 3:19 6:1 64:12 174:23 p.m. 105:25 151:14,21 181:20 181:23 219:18 p.o. 2:5 page 3:11 55:6 56:10 57:13,17 61:2 86:1,6,21 91:15 92:1 93:2,8 93:11 94:7 127:10 127:11 128:3,6 129:3,20 130:11 131:2,11,16 132:10 133:7,11 133:20 134:3			

135:10,21 137:8 137:21 139:4 140:10,13 141:15 141:19,22 142:2 142:13 143:1,20 143:21 144:1,13 150:15 154:4,25 155:1 156:9,19 158:13,16 202:3,6 202:7 222:4 pages 85:25 paid 103:5 112:1,1 112:2 144:24 145:2 pain 44:22 45:7 58:16,18 paint 121:12,13,15 156:1,6 212:10 painted 121:3,5 130:19 132:4 134:14 135:16 painting 124:1 paints 212:9 pam 76:15 pan 191:17 panel 138:10,13 pans 168:12 pantry 128:12 paper 8:16 80:19 80:20,22 123:25 133:19 paperwork 97:18 paragraph 86:22 87:13 94:8,19 144:2,14 146:17 150:16 151:1 204:5,11,19 paragraphs 87:12 parasites 58:8 pardon 72:19	parents 71:4 72:3 park 110:15 parked 110:24 parsley 191:19 parsnips 191:21 part 99:19 138:7 198:9 199:2 200:14,20 201:1,5 201:10 202:9 205:25 208:19 participate 14:14 particular 167:15 parties 5:3,15 20:12 parts 157:24 party 6:10 198:11 200:19 pass 14:24 72:6,8 72:13 213:1 219:5 passed 72:11,22 passing 14:13 patient 12:22 62:23,25 104:2 patients 50:6,8 105:11,14,17 patterns 215:8 paul 2:18 6:20 202:2 205:21 206:6,13 213:12 paullafata 2:20 paved 119:20 pawlet 104:21,25 105:2 107:11,15 107:22,24 108:1,9 108:15,16,16 215:21 pay 84:14 89:3 97:19 111:23 112:18 117:4 121:17 146:10 149:18 162:14,16	216:9,24 paying 35:25 payment 112:1 peaches 191:23 peanut 191:25 peanuts 192:2 pears 192:6 peas 192:4 pecan 192:10 pecans 192:8 pediatric 105:14 pending 9:2 penicillin 42:9,11 43:8,20 55:13 people 12:9 13:8 13:11,16 14:15 24:24 25:14 27:24 74:9 79:11 86:13 86:19 87:8 88:8 107:18 150:11 153:12 172:23 205:16 215:13 pepper 185:18 pepperoni 192:12 perfluorinated 90:1 perfluorooctanoic 82:23 perform 16:1 18:4 performance 1:9 5:21 performed 18:7 84:11,18 99:24 152:20 153:11 165:3 perfume 27:1,2,12 27:13,20,24,25 28:7 35:20,23 perfumes 27:9 period 14:9,21 15:2,21 19:25	20:5 22:22 46:5 99:3 104:17 periodically 164:3 periods 16:19 permit 216:9 person 11:24,24 12:10,13 14:10,24 28:3 97:11 221:14 personal 144:6 175:15 personally 76:21 169:23 208:13 personnel 26:10 persons 1:5 5:20 pests 181:12,16 pfa 88:9 pfoa 3:22 10:18 78:2,7,10 79:20 80:13,16,24 81:6 81:11,19,23 82:3 82:20,22,25 83:7 83:21 84:2,10,16 85:9,16 86:14,18 87:3,9,20 88:9,18 88:21 90:18 91:1 92:13 93:16,20 94:3,24 95:6 115:24 116:6,8 117:24 144:17 146:20 166:22,24 168:20,24 169:2 169:19 171:25 173:4 177:8 215:15,24 pharmacy 42:3 103:15 phenacetin 67:12 phenobarbital 67:10 phone 2:6,10,16 2:20 12:12
--	--	---	--

phones 5:11 phosphate 205:11 photo 136:8 158:16,20 photograph 131:3 photographs 4:1 photos 158:18 phrase 79:16,25 phrasing 213:25 physical 13:20 18:18 24:9,11 26:13 39:15 physician 31:14 31:17 38:4,8,11,13 55:2 60:17 87:8 physicians 12:25 13:17 19:16 37:24 38:24 39:9 72:25 82:25 pick 5:8 pickles 188:5 picture 126:3,11 129:4 138:3 139:5 141:16,23 143:8 pictures 126:7,13 159:12 197:16 pie 184:17 187:5 192:10 193:2 piece 184:9 207:20 pinched 23:4 pineapple 192:14 pipe 137:10,11 138:17 142:20 pipes 124:25 pistachios 192:16 place 5:14 27:12 145:21,25 178:18 plaintiff 7:1 219:8 plaintiffs 1:6 2:3 5:21 7:3 143:17 169:24 171:3	plan 81:18 94:13 163:5 216:17 planes 196:20 plans 162:23,25 163:4 166:3 215:9 plant 171:20 planted 122:4 plastics 1:9 5:22 please 5:7,10 6:16 7:12,22 8:23 19:1 30:4 31:5 55:6 56:11 57:13 92:1 125:11 127:10,11 128:3,6 129:3,20 130:11 131:2,11 131:16 132:10 133:7,11,20 134:3 135:10,21 139:4 140:10,13 141:15 141:19,22 142:2 142:13 143:1 150:15 156:9,19 158:13 plugged 100:12 plumbing 124:22 plums 192:21 plus 110:12 pocket 215:23 point 53:18,23 83:14 93:12 152:12 pointed 99:11 pointing 157:7 poison 75:20 149:10 150:3 pole 142:22 policy 14:12 23:3 27:11 35:23 polish 76:7,9,20 76:23 77:19,19	political 199:24 polluted 150:1 polyps 46:18 52:14,16 175:16 pool 75:1 122:16 122:18,21,23,25 123:3,5 149:16 157:3,4,5,10,14,14 157:15,17 210:13 216:6 porch 139:12 pork 70:6,6 port 194:25 portion 126:12 positions 21:13 positive 51:24 52:3 81:11,16 possible 34:12,25 199:3 possibly 199:4 potato 192:23 potatoes 118:3 192:25 194:23 pots 168:11 pottery 196:9 powder 74:25 power 100:7,10,13 100:17 120:3,6,9 powered 100:7 powette 107:21 ppt 94:3 practice 163:22 practitioner 83:9 precautions 103:9 prefer 11:2 55:24 pregnancy 20:8,14 20:25 pregnant 20:7 premiums 162:16 preparation 10:23	prepare 10:10 prescribe 15:2,5 17:21 prescribed 59:22 prescription 17:13 48:10,17,21 presence 166:24 168:24 169:2 present 6:13 13:4 106:20 156:1 presented 204:1 preservatives 55:23 president 198:22 198:24 press 4:11 203:14 pressure 49:21,24 50:3,5 52:11 pretty 101:5 previous 15:15 57:13 160:4 previously 7:15 15:10 price 42:5 primary 3:15 38:8 38:10,13 54:20,25 55:3 print 221:9 printed 90:12 92:10 prior 10:24 98:5 155:25 163:24 privacy 114:6,24 private 5:9 probably 8:9 40:2 41:3 50:14 81:25 82:4 99:15 104:14 128:20 131:1 138:6 148:23,25 180:16 193:14 195:8,11 209:19
---	---	---	---

[probably - ready]

Page 24

<p>209:22 210:3</p> <p>problems 16:21</p> <p>28:20 87:21</p> <p>procedure 175:12</p> <p>procedures 46:5</p> <p>proceeding 6:16</p> <p>process 78:8</p> <p>208:20</p> <p>product 34:1</p> <p>205:13</p> <p>production 205:11</p> <p>products 78:10</p> <p>professional 1:15</p> <p>21:5 221:3</p> <p>progressive</p> <p>198:11 200:19</p> <p>promise 205:25</p> <p>property 4:4 89:6</p> <p>89:14,19 96:17,23</p> <p>98:24 111:15,18</p> <p>114:13 115:7</p> <p>116:10 117:22</p> <p>120:4,7,12 122:16</p> <p>123:7 146:19,19</p> <p>146:21,24 147:2,7</p> <p>147:18,22 148:13</p> <p>148:16,19 149:2,9</p> <p>149:15 160:10,13</p> <p>160:16 161:19,22</p> <p>161:25 164:16,22</p> <p>164:25 165:1,4</p> <p>168:19,23 216:19</p> <p>217:2</p> <p>prophylactic 53:1</p> <p>53:2</p> <p>proposed 150:19</p> <p>prosciutto 188:9</p> <p>protonix 41:13,14</p> <p>41:16,20 42:8,15</p> <p>42:17,25 43:2</p>	<p>provide 12:2</p> <p>14:20 38:21</p> <p>145:10</p> <p>provided 10:12</p> <p>61:13 103:3,4</p> <p>provides 114:23</p> <p>providing 8:9</p> <p>psychiatric 151:5</p> <p>psychological</p> <p>151:5</p> <p>psychosomatic</p> <p>103:21</p> <p>psychotropic</p> <p>103:21</p> <p>public 7:8 201:15</p> <p>204:23 220:17</p> <p>221:22</p> <p>pull 24:9 213:6</p> <p>pulled 26:5</p> <p>pump 97:1,2,4,7,9</p> <p>97:11,14,20 98:1,5</p> <p>98:8,23 99:6,14</p> <p>100:7 116:18</p> <p>144:25,25 145:3</p> <p>148:11 163:17</p> <p>pumping 98:3</p> <p>pumpkin 193:2,4</p> <p>pumps 75:1 99:1</p> <p>purchase 152:10</p> <p>161:25</p> <p>purchased 112:4</p> <p>pure 146:9</p> <p>purpose 12:17</p> <p>53:2 131:19</p> <p>purposes 59:16</p> <p>pursuant 1:14</p> <p>pursuing 151:3</p> <p>push 201:8,12</p> <p>206:1</p> <p>pushing 22:1</p>	<p>put 24:21 27:11</p> <p>32:11 48:24 75:1</p> <p>75:9,10 78:12</p> <p>97:1,4 112:5,25</p> <p>116:18 122:3,6</p> <p>123:12 124:11</p> <p>126:17 134:12</p> <p>140:8 147:12</p> <p>150:7,13 163:14</p> <p>201:12 202:22,23</p> <p>205:13 209:16,24</p> <p>216:23</p> <p>puts 210:14</p> <p>putting 147:15</p> <p>q</p> <p>qualified 50:3</p> <p>quality 99:7,14,24</p> <p>163:18</p> <p>quarter 101:2,2</p> <p>117:8</p> <p>quarterly 117:5,6</p> <p>146:10</p> <p>question 8:22 9:2</p> <p>45:19 79:6 109:2</p> <p>172:12 181:3</p> <p>182:3 199:9,10,21</p> <p>200:3 214:9,14,15</p> <p>218:10</p> <p>questions 8:8,19</p> <p>9:13 36:25 37:2</p> <p>37:10 172:24</p> <p>174:6 202:13</p> <p>213:4,21 215:7,10</p> <p>215:22 216:13</p> <p>218:1,7,15 219:7</p> <p>219:10</p> <p>quickly 28:17</p> <p>quinn 2:14,18 6:20</p> <p>6:23</p> <p>quinnemanuel.c...</p> <p>2:16,20</p>	<p>quit 20:8</p> <p>quite 112:13 113:4</p> <p>118:15</p> <p>r</p> <p>r 2:1 7:23,23 30:7</p> <p>68:1 222:1,1</p> <p>radiation 59:10</p> <p>radiology 16:3</p> <p>17:24</p> <p>rain 137:2</p> <p>raise 118:19</p> <p>raised 158:21</p> <p>raisins 193:6</p> <p>rarely 188:16</p> <p>190:7</p> <p>rash 43:12</p> <p>rates 112:6,13</p> <p>raw 70:20</p> <p>ray 18:2 50:10,13</p> <p>rays 12:25 16:1</p> <p>53:8</p> <p>reached 35:22</p> <p>219:19</p> <p>reaction 25:15,21</p> <p>26:13 27:9 31:2</p> <p>41:15 42:6,9,14,17</p> <p>42:25 43:8 44:7</p> <p>76:4 205:3 206:3</p> <p>reactions 25:25</p> <p>26:24 28:8 30:15</p> <p>43:6,19</p> <p>read 10:11,17,17</p> <p>30:4 81:8 111:7,9</p> <p>196:8 197:17</p> <p>220:3</p> <p>reading 30:10</p> <p>81:17 84:6 143:23</p> <p>197:13</p> <p>ready 54:8 106:5,7</p> <p>182:1</p>
---	--	--	---

real 4:4 111:15 146:21 147:7,18 147:22 148:13 159:21 160:4 163:3,10 164:20 realize 217:10 really 24:20 27:10 28:17 31:25 37:4 65:5 119:5 138:1 149:25 172:9,15 196:3 realtor 168:18 reappraised 152:12 reason 154:17 156:16 160:15 161:18 214:4 222:4 reassessed 111:10 rebuild 162:14 recall 10:15,23 13:10 21:16 22:20 22:21 23:10,13,19 25:23 26:20,22,23 28:7,11,12 31:3 32:19 34:18 35:17 36:6 41:14 43:21 44:10,13 49:2 50:20,21 51:5 53:5,10,11 61:9,19 61:23 63:12,19 64:1 65:2,10,17,21 66:2,17,24 80:22 82:8,9,12,17 84:23 86:17 87:7,25 88:19,25 90:14,25 91:22 97:15 99:15 99:17,24 100:2 102:23 103:14 104:1 116:3 123:9 125:10 134:23	135:4,16,18 136:17 141:14 148:15 152:1 153:13 159:11 163:19,19,20,23 173:23 176:19 203:2,4 204:9 recalled 190:9 recalling 86:8 recalls 67:15 receive 27:8 31:21 42:24 46:16 48:9 51:9,20 54:25 56:3 62:2 116:12 received 51:17 59:10,15,15,20 61:16 receiving 51:22 61:19 90:14,25 91:22 203:2 receptions 146:6 recess 54:2 105:23 151:18 181:22 recognize 92:7 94:5 126:3 recommend 85:8 recommends 85:12 record 3:15 5:6,15 6:15,22 7:13 8:15 8:18 9:16 30:6 32:12 53:24 54:1 54:6 55:8 101:8,9 101:10,12,14 105:20,22 106:1 151:15,17,22,24 157:6 181:19,21 181:24 182:9 219:20,22 220:6 221:11	recorded 5:17 recording 5:14 recreation 197:18 recreational 183:14 recyclables 111:3 red 33:18 69:1 193:9 redid 140:24 redirect 3:4 216:15 219:9 reduced 221:9 refer 83:19 144:22 147:7 148:14 204:5 reference 19:16 71:4 174:10 175:12 referenced 29:14 referencing 30:25 referred 26:10 131:7 206:8 referring 34:6 73:6 129:12 135:13 144:23 203:10 refers 54:20 159:20 173:19 refinance 112:12 112:17,18 refinanced 112:6 112:8,10,14 153:2 refinancing 112:22 refinished 124:18 reflects 214:24 reflux 39:25 refresh 208:1 refrigerator 125:9 163:9	regarding 218:1,7 218:15 registered 1:15 17:1 221:2 regular 122:14 178:14 179:5 regularly 49:6 71:1 reimbursed 169:3 169:6 related 6:10 relationship 150:22 relevance 36:4 199:4 relevant 180:25 199:5,18 relief 78:15 79:8 remediate 166:23 167:7 remember 23:16 25:11 28:16,25 63:5 97:16 98:14 99:10 103:18 105:5 106:24 112:10 123:17 141:13 143:23 152:18 154:11,12 155:13,14,14 167:15,24,25 192:18 213:8,21 213:24 214:8,14 214:15 215:10,25 remodeled 123:22 remodeling 123:19 140:21 remodelling 124:3 removed 46:18 remover 77:20 rent 162:21,23
--	---	--	---

rental 107:2,5	representatives 172:8	100:3 116:1	189:13 190:23
repainted 126:25	representing 6:5,8	retail 165:14,16	196:22 204:11
127:2 130:21,23	required 11:25	retire 14:4 163:2	208:4 209:12
repairs 10:19	23:5	retired 32:25	219:12
repeat 19:1 52:1	resampled 94:12	200:13	rights 199:23
65:24 67:25 79:6	resampling 94:13	reviewed 10:18,19	risk 73:1 83:22
182:15 218:22	94:16	34:16	84:2 175:14,20,22
repel 74:21	research 165:3	rheumatoid 71:10	rivers 3:19 4:9
repellant 74:19	resection 45:2	71:11 73:15	64:11 174:23
repellants 183:7	reserpine 67:20	rhode 178:20,21	rn 13:19 15:9
rephrase 13:15	residential 4:3	179:18 180:8	road 90:4 92:3
82:21 97:24	154:2 155:19	rice 193:11	93:12 106:14,15
121:11 176:8	165:1,4,6	richard 155:10,13	106:17 107:1
replace 97:2,25	residual 205:12	ridiculous 180:20	108:20 109:4,17
113:16,18 120:16	resolve 48:15	rifampin 67:22	118:16 146:5
120:18 121:17	respect 85:9	right 8:7,23 9:2,15	165:13,20
135:3 141:2,3,5,9	respond 14:16	10:15 21:9 45:23	roast 193:13,17
141:11	17:12 203:6	47:8 54:10 55:16	roasted 193:15
replaced 97:11,14	responding 203:21	57:8,17,20 60:14	rocks 205:6,20
97:20 99:14 113:6	response 24:1	60:25 64:15,17	rocky 119:11
120:11,14,20,22	203:2	79:15 89:23 91:7	rodents 75:20
121:1 134:21	responsibilities	92:21 93:6,9 98:4	role 198:21
135:2 139:17	11:17 14:8 17:3	100:13 101:16	rolls 193:19,20
163:17	19:6,9	110:22 112:19	romac 38:15,16
replacement 113:1	responsibility	115:10,13 116:11	ron 71:20 72:17,23
replacing 98:8	17:2	126:1 127:8 128:4	ronald 170:21
report 3:13,14,17	rest 124:16 180:4	131:2 132:4,13,15	roof 120:12,14,18
4:3,9 28:20 29:5	202:24	132:25 136:18	121:17
29:11,13 33:8	result 3:18 35:25	140:2,17 141:22	room 6:13 129:21
154:2 155:19	46:16,25 62:17	142:6 143:8	131:19,20 132:7
175:3	85:16 86:23 87:19	144:11,12 146:12	132:11,20 133:8
reported 221:8	90:14,21,25 92:15	146:13 148:1,1,15	133:12 141:25
reporter 1:15 6:7	93:22 146:17	148:17 149:21	142:1 143:2
8:10 20:11 203:13	160:12 169:19	153:23 155:15	rooms 178:10
221:3	resulted 164:12	157:5,8 158:9,25	rotator 24:9
reports 12:21 23:6	results 3:22 83:8	160:7,10 161:10	roughly 179:14
23:7	84:21,23 85:5	161:12 163:9	rounded 135:25
represent 6:21	86:7 87:16 90:1	164:7 173:21	routes 15:20 17:16
80:9	91:24 93:9 94:21	175:1,7 176:23	routine 48:5 99:20
representative	94:23 99:9,21	177:24 178:2	105:7
80:3,6		181:18 182:18	

row 90:17 92:12 93:16,19 rpr 221:21 rug 77:8 run 117:3 rushing 22:5 rutland 179:25 180:1,2,5	65:6,13 86:7,12 87:2,15,19 89:25 90:21 92:2,10,15 93:12,22 94:11 143:16 145:19 149:1 150:18 154:1 155:3,16,18 155:22 157:8 158:15 161:16 174:22 175:14 202:20 204:12,19 208:3 scan 50:14 52:21 52:25 53:6 61:14 scans 50:15,18,25 52:23 scarred 82:14 school 16:21 104:13,14,17 105:10,12,15 science 4:13 207:17 scientific 206:11 scotchgard 197:20 seal 221:17 sealed 89:17 98:12 98:21,22 164:4 season 185:8 194:20 seasonal 42:2 second 55:6 85:24 86:6,22 92:1 93:8 93:11 94:8 110:8 140:14 144:5,13 157:1,2 204:5 section 34:14 45:16 55:10 56:12 57:6,15 61:3 62:22 149:1 204:17	sections 152:16 see 12:19 13:6 21:18 29:10,16,24 31:7,12,14,15,17 31:19 33:7,10,14 33:17,23 34:2,4 38:19 48:7,13 49:5 54:19,22 55:2,10,13 56:13 56:16,25 57:6,15 60:14,18,25 61:2,4 61:7 62:11,13,17 62:22 63:3,10,17 63:22,24 64:8,11 64:19,22,25 65:6,8 65:15 72:7 82:5 85:21,24 86:1,4,12 86:15,22,25 87:2,5 87:12,17,23 89:25 90:2,11,19,21 91:15 92:2,9,13,15 93:2,16,19,22,23 94:3,8,14,19 95:3 125:15 128:22 132:13 137:4,8,23 138:11,18,22 143:15 144:2,5,9 144:14,20 145:19 145:22 146:22,24 147:5 149:3 150:16 151:1,6 154:1,5,6,9,14,22 154:25 155:5,11 155:18,21,22,23 156:4,10,13,14,21 158:15,20,23 159:20,23 160:23 161:4,12 162:1 170:14 173:16 174:1,9,20,22 175:5,11,17	179:15,17 180:6 180:16 199:1 202:20 203:7 204:4,10,13,17,19 205:1 207:3,10,12 207:15,18 seeds 193:4 194:21 195:3 seeing 38:6 seek 35:12 seeking 78:15 79:8 seen 9:22 10:2,5,7 38:10,23 39:3,9,12 61:14 219:2 self 48:14 77:14 sell 148:23 162:19 162:25 163:5 seminars 103:4 sense 74:13 184:4 sensitive 5:8 55:23 56:8 sensitivity 27:11 31:23 sent 85:6 sentence 87:2 94:20 144:5 145:19 203:5 september 48:2,3 51:6,7 92:10 septic 109:15 septra 55:18 serax 67:6 serves 96:19 service 11:14 132:18 services 178:9 sesame 194:8 set 28:17 84:12 95:14 143:8 settlement 35:22 35:22,25
s			
s 2:1 3:10 66:15 222:1 safe 78:17 149:11 safety 34:10 95:7 sage 193:23 saint 1:8 5:21 6:21 78:4,6 94:12,17 171:10,12,15,25 173:4 222:2 salami 193:25 sale 164:23 salt 194:2,2 sam 203:6,12,20 sampling 93:12 sand 119:9 139:20 sandwich 183:24 sassafras 194:4 sat 172:11,12 sauce 187:22 194:12 sausage 70:8 194:6 saw 38:25,25 39:1 48:1 64:2 197:16 sawdust 212:21 saying 23:12 39:18 96:8 163:19,20 says 29:10 30:21 31:10 33:7,17 56:15 57:10 61:6 61:14 62:17,23 63:2 64:11,23			

seven 104:15,16 176:5 severe 41:15 44:22 sewer 120:3,5 shake 8:17 shaken 205:12 shampoo 77:8 124:20 shared 83:8 shed 117:12,12 sheet 34:10,23 220:5 sheets 34:16,22 shellfish 194:10 shelve 26:6 shingle 120:17 shingled 120:15 shingles 12:7 120:23 shoe 76:20,22 shook 110:20 shop 180:14,19,19 short 53:24 shorter 169:20 shortly 33:17 shortness 25:6 26:18 30:8,11 33:20 shot 17:20 55:22 shoulder 24:3,5,12 29:2 show 94:23 129:4 132:5 showed 213:12 shower 134:18,19 134:24 135:1,3 141:9 169:11,12 169:13,16,18,21 showers 169:20 shown 126:11	siblings 72:16 sic 16:16 24:16 178:1 sick 14:23 side 34:12,25 103:21 115:6 117:18 132:13,16 132:25 135:25 136:18 161:12 sides 170:2 sideways 89:24 siding 120:24 121:1 signature 5:3 29:17,20,21 31:6,8 33:10,12 143:21 221:21 signed 143:24 154:8 significant 71:12 73:13 74:3 182:13 182:16 silica 212:13 silver 1:16 2:8,9 6:1,25,25 20:18 62:7 101:1 107:14 108:7 110:17,19 138:17 174:6 213:14,18 214:4 similar 25:15,24 26:23 42:7,15,16 43:7 similarly 1:5 5:20 single 109:17 156:2 sink 89:9 127:15 127:17 134:18,19 134:20 135:4,13 141:2,3 sinus 47:21	sister 56:15,18 72:10,12,17,23 sisters 71:15,17 sit 14:12,25 36:16 113:21 119:13 149:10 site 161:13 sitting 78:22 142:14 situated 1:5 5:20 situation 85:13 six 134:13 201:8 skied 197:18 sleep 4:8 48:24 173:19,23 sleeping 31:25 59:22 sliced 188:10 slideshows 201:16 slightly 65:7 slow 117:20 small 22:4 107:25 137:16 smell 168:3 smells 171:18 smelt 168:1 smoked 57:11 smokestacks 78:13 205:12 snap 22:8 snores 174:10 social 11:14 15:9 57:6 socialize 215:13 socializing 215:9,9 socially 165:22 169:23 soda 69:15 softener 76:11 135:24 136:15	soil 78:1 116:5,8 117:24 119:1,7,9 119:11 147:20 149:7 164:15 167:6,7 soils 146:19 sol 115:4,20,21 solar 100:17 solomon 115:19 solution 76:5 solvents 183:11 somebody 11:19 14:17 21:24 23:4 35:10 somnolence 174:10,12 sorry 10:4 22:13 45:21 60:11 68:14 108:12 110:21 125:25 128:7 182:15 sort 13:16 14:20 18:17 24:7 38:4 58:22 70:1 73:24 74:12 111:1 113:11 172:11 201:10 sound 62:7 soup 188:1 source 169:15 southwest 16:16 16:24 17:3 18:10 18:21 20:2 22:18 23:18 178:1 southwestern 3:16 16:10,11 21:17 173:20 soy 194:12 spa 123:7 speak 12:9
---	--	---	---

speaking 20:12 199:13 specialist 6:5 specialty 38:24 39:9 specific 36:6 105:4 specifically 23:10 65:12 84:5 spell 7:20,22 spend 179:1 spent 121:12 123:9 sperry 2:5 spice 190:12,16 193:23 194:16 195:5 spinach 194:14 splash 127:4 split 110:6 119:25 spoken 82:24 sports 166:20 spouse 14:24 spray 74:15,17 75:17 76:16,25 77:15,17 spraying 27:24 sprays 75:13,15 sprinkle 75:5 sprout 186:5 square 110:10 staff 13:5 27:12 stainmaster 197:22 stains 211:13 standard 95:2,7 95:18 96:4 standards 95:20 95:22 standing 23:23 32:12	stands 82:22 star 194:16 starch 76:25 start 13:23 16:11 51:22 started 20:2 23:25 81:12 215:17 starts 12:12 87:13 94:9,20 144:17 state 3:23,25 6:14 6:16 7:12 26:4 35:1,13,23 36:19 78:20 79:19 81:12 81:15 84:12 85:11 89:2 91:16,23 93:3 95:1,7,13 100:1 102:9 148:6 152:13 171:24 172:9 173:3 198:20 statement 88:1,3 205:3 statements 144:6 220:7 states 1:1 5:23 86:19 87:3,10 statin 40:21 stay 85:11 105:6 stayed 16:20 20:9 108:16 200:13 steak 70:12 steamed 70:22 stenographically 221:8 steps 157:4,18 167:7 sternberg 2:9 steward 198:22 stipulation 5:1 stone 109:21 124:8	stood 23:24,24 stop 32:20,23 stopped 41:16 stopping 53:18 storage 110:14 store 82:4,18 121:15 165:14,16 182:11 183:9 stored 78:13 111:1 210:18 stores 137:19 storm 114:12 stove 109:13 125:9 125:10 126:19 stovetop 126:17 126:18 strawberries 194:18 street 1:17 2:9 6:2 165:15,16 167:11 171:22 209:17,25 strep 59:6 strike 205:5 structures 117:10 studies 204:15 205:21,23 206:7,7 206:12 studs 140:23 study 4:8 173:23 subject 155:23,25 158:15 subjects 102:23 submerged 97:9 submersible 97:1 144:25 subq 17:18 subscribe 220:6 221:16 subscribed 220:12 substance 82:6 217:19,23 218:3	218:12,18,25 substitutes 69:17 successful 45:12 52:18 sucks 75:2 sudden 79:3 sued 36:10 suffer 33:20 suffered 146:20 sugar 65:6,11 69:17,19 suing 35:10,18 suit 36:19 sullivan 1:3 2:14 2:18 5:19 170:15 170:17 222:2 sum 82:6 sumac 114:5,9,23 114:25 summer 69:25 80:14,23 197:9 sumner 170:19 sunburn 182:13 182:16 sunflower 194:21 195:3 super 103:8 superior 81:7 supplements 54:10 supplies 44:3 211:23 supply 26:7 94:12 100:8,10 211:25 212:2 support 14:25 16:22 143:17 supposed 199:18 supposedly 48:25 sure 8:18 12:1 17:10 37:18 79:10
--	--	---	---

[sure - thank]

Page 30

85:1 97:6 100:5 102:22 117:7 145:16 148:22 163:20,22 183:12 212:3 218:23 surface 78:1 surgeon 38:25 39:8 60:21 175:9 surgeries 45:14 46:1 surgery 37:20 44:23 45:1,3,6,10 45:12 60:22 surgical 46:4,6,9 surveillance 175:15 sustained 85:15 swallowing 30:16 swear 7:5 sweater 27:23 sweet 194:23,25 swelling 25:12 26:17 27:4 30:12 30:17 swells 33:18 swimming 75:1 sworn 7:7 220:12 221:4 symptoms 26:19 33:21 45:5 83:13 syndrome 61:20 61:21 62:3 system 89:17 98:12,22 100:13 124:23 systems 204:23 205:10	table 37:3 96:15 132:13 tablet 67:3 tad 27:14 take 5:14 8:25 15:23 20:9,24 40:7,13,14 41:6,9 41:25 47:3 48:10 54:10,11 55:24 56:8 57:24 58:22 58:24 66:21 68:13 85:5 102:8,15 103:23 104:5,7 126:7 137:14 169:20 176:13 205:25 taken 1:14 5:18 9:4 31:24 40:5,23 42:7,14 43:7,9 53:23 54:2 58:7 58:12 105:23 126:13 131:4 148:11 151:18 167:6 181:22 takes 123:3 179:6 talk 14:25 83:6 168:6 talked 47:19 53:10 57:20,22 58:1 71:6 82:7 116:18 125:5 142:5 148:16 163:10 168:18,22 177:23 190:22 208:22 216:6 talking 23:23 27:13 80:25 81:6 86:17 87:25 108:25 talks 219:8	tall 23:22 tank 109:15 136:25 137:12,16 137:19 tanks 98:24 tap 108:21 109:6,9 176:15,20 177:4 177:12,16 tapazole 66:17 tape 100:25 101:5 tar 209:15,24 tarragon 195:5 tarred 209:20 tarring 209:21 tastes 117:2 tax 4:7 160:12,25 161:6 213:9,11 216:18 217:13,16 taxes 216:24 taxpayers 4:6 tea 69:13 187:14 187:16 190:2 194:4 215:18 ted 107:3 140:25 160:1 teenager 42:10 teeth 4:10 202:21 teflon 168:11 telephone 12:10 tell 84:1 87:16,19 100:3 148:2 216:18 217:3 telling 63:19 105:5 218:5 temporary 25:6 37:22 107:2 ten 40:2,9 66:25 105:3,6,7 108:12 114:12 135:19 163:11,15	tendon 24:9 tendonitis 24:8 29:3 termites 181:14 test 49:8,13 50:3 84:10,11,14,18,21 85:5,9 86:7,23 87:15,19 90:14,25 91:24 92:19 93:8 99:9,14,21,25 144:18 156:6 163:18 164:8,10 tested 49:21 81:10 88:18,21 91:6 99:7 115:24 116:6 116:8 163:24 164:3,6,15 testified 7:8 testify 144:7,8 221:4 testimony 8:3 9:13 10:25 36:14 107:23 216:13 217:19,23 218:4 218:12,18 219:1 221:11 testing 16:3 17:24 18:2 49:5 81:13 81:16 85:7 88:23 89:3,6 99:17,20 102:8,9 104:8,10 172:17 tests 50:5 84:16 116:2 164:12 tetanus 55:20,22 tetrachloride 210:10 tex 198:2 text 4:13 206:17 thank 7:4,24 10:21 60:13 61:22
t			
t 3:10 7:21 104:21 222:1,1			

106:12 107:24 125:19 145:18 170:10,11,13 206:5 207:9 thanksgiving 165:25 191:22 theodore 93:3 therapist 13:20 39:15 therapy 18:18 24:10,11 59:10 thimerosal 55:25 56:2 thing 23:2 27:4 29:2 68:17 74:12 133:1 138:16 140:24 188:10 205:25 215:16 things 11:25 12:15 15:1 44:4 47:21 49:13 58:22 64:2 70:1 78:16 79:9 83:16 103:6,10,10 103:10,17 111:1 136:22 149:14 205:23 207:24 think 9:24 24:23 27:19 39:11 46:8 77:5 78:6 79:11 79:15 80:12,14 81:14 88:7,11 97:23 102:18 105:19 107:14 112:14,25 114:22 117:7 124:6,24 125:18 136:21 148:6 149:21 153:1 162:1 163:21 199:22 200:3,7 206:2 214:18 217:3,7	thinking 78:21 200:24 thinning 59:16 third 93:19 thought 27:22 126:2 148:23 thousand 107:18 123:15 thousands 123:16 144:24 145:7 153:23 three 46:14,17 68:24 69:12 118:13 121:7 126:14 151:23 153:3 158:3 169:10 178:17 184:20 186:22 191:18 193:18 195:11 196:4 210:3 219:20 throat 30:12 59:6 thyme 195:7 thyroid 59:25 63:16,20 tightness 33:20 tile 127:4 time 6:17 8:5 10:6 11:16 13:9 16:22 18:20 19:25 23:17 24:15,23 30:13,16 32:10 40:25 44:7 46:5 48:1 50:17 61:12,24 68:16,17 72:11 81:22 100:6 102:15,19,20 104:20 105:19,24 108:19,24 120:11 121:5 124:2 127:14 130:25 133:7,19 134:12	135:4 136:3 139:16 151:11 152:7,18,24 153:7 159:10 165:24 167:9 168:15 171:14 178:21 179:1 181:5 218:8 times 12:18 20:16 27:6 44:16 68:25 88:21,24 96:13 127:2 130:23 152:4,16 153:4 178:17 179:8 185:21 186:22 190:8 192:7 193:18 195:11 196:1 tiny 205:8 tired 14:5 title 207:17,20,22 toast 195:10 tobacco 57:10,11 212:15 today 5:25 9:13 29:14 31:11 34:7 37:25 38:11 58:5 73:22 85:16 96:9 126:15 163:5 171:19 177:1,17 217:18,24 219:1 today's 5:6 10:10 10:24 95:20 212:24 218:13 toilet 134:17 141:11 told 106:9 148:14 172:15,16 177:17 toluene 212:17 tomatoes 118:3 195:12	tommy 204:5,8 tool 117:12 tools 111:2 toothpaste 44:2 top 29:10 33:7 54:19 56:12 57:15 60:14 62:22 64:11 64:20 78:22 86:1 86:4,7 89:25 90:5 90:17 92:2 93:8 93:11 137:21,23 143:15,16 154:1 155:18 156:21 158:3,4,6,15 159:20 161:3 170:14 173:16,19 174:22 202:20 204:12 207:12 total 145:6 totally 134:21 148:10,11 touched 71:3 town 4:5,7 107:17 107:17,19,21,25 117:5,6 149:18 152:14,14,21 160:25 201:17 216:9,17 217:1 toxic 79:1 88:12 205:12,18 toxin 83:11 toxoid 55:20 traffic 150:11 trained 83:12 transaction 155:8 transcript 220:3,6 transcription 221:10 transported 205:14
--	--	---	--

trash 138:25	131:2,11,16	ultimately 44:23	upgrades 121:21
travel 179:5 180:5 180:9,10	132:10 133:7,11 133:20 134:3	ultrasound 3:17	upper 60:25 62:17 129:6 158:22 170:14
treat 25:20 37:20 40:10 41:4,22 59:25	135:10,21 137:17 139:4 140:10,13 141:15,19 142:2 142:13 143:1,20 144:1,13 150:15 154:4 155:15 156:9,19 158:13	ultrasounds 52:8 52:10,13 53:8	upright 138:23
treated 47:18 181:11,16	turned 24:8 52:2 137:21	umm 22:11	upset 78:21 82:10 147:3 149:22
treatment 28:23 42:24 48:9 52:15 54:25 61:16 62:2	twice 52:1 76:24 112:7,8,9 130:24 183:19 186:10	underground 96:15	upsetting 150:1
treatments 35:1 129:17	twin 3:19 4:9 64:11 174:23	underneath 56:20 56:24 149:9 175:5 217:8	upstairs 130:14 141:24 142:14
treats 47:6	twisted 22:7 24:2	understand 8:13 8:22 9:12 37:6 78:25 79:22 80:2 88:6 90:23 92:17 94:16 95:5,10,17 96:7,8 109:2 112:24 119:4 168:11 177:20	urge 118:5
trees 114:13,17,21 122:1	two 20:9 46:22 73:3 87:12 101:13 102:8 106:1 110:2 110:4 111:7,9 113:4 118:23 121:7 122:20 140:19 151:16 158:8 162:3 178:17 179:25 182:18 193:18	understanding 77:23 78:5,14 79:7,10 80:5 153:22	urquhart 2:14,18
tried 162:19,21 205:22	tylenol 58:23	understood 23:15 153:7 157:20 214:18	use 26:7,8,14 42:3 50:1 54:14 58:3,5 69:17,24 70:6 74:12,21,23 75:4,8 75:17,22,24 76:1,7 76:11,13,15,18,19 76:20,22,25 77:8 77:19 99:3 100:17 109:5,6,9 116:13 123:5 129:22 130:7,10,13 136:2 147:2 148:9 149:1 149:19 165:20 166:7,20 169:1,15 176:16,25 177:3,5 177:10,14 182:20 183:7,14 194:2 195:16 196:25 197:3,8,10,20 208:21 212:15 216:9
triglycerides 40:11,17 41:9,23 49:17	type 29:13 37:2 103:9 119:13 188:10	uniform 4:3 95:18 154:1 155:18	user 57:10
truck 150:11	typed 155:22	union 198:14 200:14	uses 130:9 210:12
trucks 147:14 150:10 205:14	typical 156:2	unit 5:16 85:3,3 93:25 101:9,13 106:1 151:16,23 219:19	usually 12:12 70:21 73:3,4 103:7 183:22
true 144:11 151:8 221:11	typically 108:20 169:9 181:5 193:8	united 1:1 5:23 86:19 87:3,9	uterine 52:14,15
truth 221:5,5,6	typing 8:11	universal 103:9	
truthful 206:20 208:8	u	university 101:23 101:24 102:1	
try 68:17 118:6 157:6	u 30:7 115:14	unlock 98:21	
trying 116:23 206:6	u.s. 86:13	unscented 76:14	
tube 17:18,18			
tumor 73:7			
turkey 193:17			
turn 5:10 28:22 55:5 56:10 57:13 86:6 92:1 94:7 127:10,10 128:3,6 129:3,20 130:11			

v	93:3 95:14 100:1 102:2 104:21 148:7 173:20 176:1,9,20 178:1,4 184:24 198:20 201:21 202:9	vsea 198:18,19,21 199:2 200:11,19 vt 2:6,10	91:1,6,23 94:12 95:2,6 96:15 97:5 98:23 99:3,4,7,13 99:24 108:20,23 109:3,5,9 115:24 116:12,13,14,24 117:2,4,5,6 135:24 136:15,21,25 137:3,6,7,12,14,17 137:19 145:21 146:8 147:12,15 148:9 149:16 163:18,23,25 164:13 166:22,24 167:10 169:2,4,5,8 169:16 171:22 176:10,12,13,15 176:19,21,25 177:2,3,5,5,8,10 177:10,14 182:5 201:2,4,9,13,22,24 202:10 204:21,21 204:23 205:6,8,9 205:10 206:1,14 211:23,24 212:2 215:17,19 216:2,5
va 14:16	vermont's 95:1,7	w	watered 177:7
vacation 111:18 178:14 179:18 180:8	versus 5:21	w 7:21 104:21	watering 136:23
vacations 178:16	vertigo 51:8,8,10 51:13,15	wait 137:18	waterline 145:21 145:24 146:1
vaccinations 56:3	vet 165:20	waite 7:19,20 71:22 72:18,19,23	waterlines 150:7
valerian 68:19	vet's 11:20,22 15:15,17 26:6 208:20	waived 5:3	waterproof 168:12
valium 67:8	veterans 11:12 13:24 16:5,9,17 22:24,25 23:3,20 28:9,14 176:1,9,20 178:4 200:12	walk 184:1 208:11	waxes 76:7
valuation 215:5	veterinarian's 165:12	walked 64:19	way 14:24 29:3 75:3 78:11 80:10 126:15 150:2
value 78:21 146:24 148:16,19 152:4 153:15,18 156:14 160:4,7,9 160:16 161:13,13 161:19 163:11 168:19,23 214:1 214:11,23,25 217:10,11	video 5:13,17 6:5	walks 27:21	ways 165:13 215:13
values 156:3 165:4	videographer 5:5 6:6 7:4 53:25 54:5 100:22 101:7,11 105:21,24 151:14 151:21 181:20,23 219:18	wall 130:19 131:9 132:2,4 133:2,5 135:6,16 138:10 138:18	we've 107:23 125:8 219:18
valuing 164:25 217:2	videotaped 1:13	wallpaper 128:15 128:19,22 129:1 130:2 132:2,4,5,7 133:14 142:5 143:6	
vanilla 195:14,16	village 3:15 54:20 54:25 55:2	walls 134:14	
vegetable 75:17 149:13	vinegar 195:18	walnuts 195:20	
vegetables 70:18 118:7 149:6	vinyl 124:8 212:19	want 23:2 37:1 78:17 79:10 83:15 83:23,24 96:1,6 101:6 146:8,10 150:4,12,23 200:6 208:11 217:12,12	
verbally 8:19	visit 47:24 49:22	wanted 16:21 74:10 85:10	
verified 34:13	voc 212:10	war 4:10 202:20	
veritext 6:6,8	vomited 20:16	wash 177:14	
vermont 1:1,17 3:16,20,23,25 5:24 6:3 11:12 13:23 16:5,8,10,11,16,17 16:24 17:3 18:10 18:22 20:3 21:17 22:18,24,25 23:3 23:18,20 24:16 28:9,13 79:19 84:12 85:11 88:1 89:2 91:16,23	vote 13:6 201:19 201:20	washer 135:23	
	voted 201:13	washing 136:9,11	
	vs 1:7 222:2	waste 78:9 205:13	
		watch 56:2	
		water 44:2 75:8,9 78:1,2,17,18 88:17 88:21,23 89:3,5,6 89:12,16,18 90:15	

[wear - years]

Page 34

wear 27:12,15 wearing 27:20 weather 197:9 weed 75:17 weeds 122:5 week 68:25 70:5 145:15 169:9 176:1 178:23 179:2 184:23 185:21 186:18,22 189:3 194:20 195:11 200:11 weekend 179:9 weekends 179:14 weekly 185:9,14 186:2,12,24 189:5 192:24 193:1,14 193:22 195:9 weeks 10:14 102:12,13 184:23 weight 58:24 wells 81:13,16 98:18 172:17 went 16:16 21:24 23:8 24:2 25:22 27:22 28:21 29:3 35:24 79:9 104:15 108:10,15 112:6 112:13 146:2 172:7 201:17 west 90:4 92:3 93:12 106:14,15 106:17 107:1 108:19 109:4,17 wheelchair 23:22 whereof 221:16 whispering 5:9 whistle 26:3,5,9,14 26:23 28:6 30:23 34:4,6	white 49:19 69:1,2 72:17 74:25 133:1 136:14 193:8 195:22 wide 151:4 wild 122:5 william 170:19 williams 2:14 6:23 6:23 willing 145:10 willow 114:18 window 129:14,17 135:6,8 windows 113:1,6,7 113:18 123:10,14 123:17 129:15 150:8 wine 68:24 193:8 193:9 194:25 withdraw 89:13 witness 3:2 7:5,6 20:20 30:10 45:18 45:21,24 55:7 57:14 107:16,18 110:18,21 136:6 174:7 203:25 212:25 213:1 218:6,15 219:5,7 221:16 witnessed 23:5 28:19 wmpd 94:13 woman 167:25 women 35:11 36:9 won 201:18 wood 76:7,9 109:13,21,23 117:12 120:25 125:10 136:2 139:15,23 142:10 196:14 212:21	wooded 114:4 wooden 157:22 woodworking 196:14 wool 2:5 word 96:13 words 4:10 202:21 202:22 wore 27:24 98:2,2 work 11:11 12:15 12:25 14:1 15:23 16:5,6,8 17:22,25 18:4,4,7,21 19:4 21:2,4,11 22:3,9 25:25 26:25 27:3 27:9,13 28:9,13 29:1 35:12 98:9 104:1 121:14 124:3 130:7 140:21 141:13 150:6 176:2,11 177:23 178:1,4 201:10 208:13 worked 11:14 18:23 19:2 97:16 98:11 103:2,22 166:15 167:25 168:6 176:9 worker 15:9 workers 21:14 22:16 23:16 24:14 28:14 81:15 working 13:23 20:2 22:18 32:10 63:2,6,16,20 works 117:3 166:10 worldwide 206:14 worm 58:8 worth 147:9	wow 13:10 108:2 write 146:17 202:8 202:24 205:24 207:25 writing 34:14,20 written 31:10 173:8 wrong 78:6 wrote 100:2 145:24 206:16,19 208:7 x x 3:10 12:25 16:1 18:2 50:10,13 53:8 66:15 y y 68:1 yard 75:18,22 113:25 114:2 146:14 147:12 yeah 12:6 46:8 79:7 109:4 117:19 137:20 142:25 146:13 162:9 179:23 181:7 184:25 190:9 192:20,24 209:8 216:7 219:15,17 year 47:25 64:24 76:24 104:17 117:23 125:2,3 161:6 178:17,21 179:6,8,14 180:13 184:20 186:10 190:8 191:22 192:7 193:18 196:1 years 20:9 23:25 26:6 32:15 38:23 39:6,10,11,12 40:2
--	---	--	--

[years - zucchini]

Page 35

40:9 41:3 45:15
45:17 46:2,13,14
47:15,19 50:12,18
51:1,3,18 53:9
59:7 60:3,3 65:23
66:2 67:1 68:15
79:2 83:17,17
104:15 106:16
108:17 121:7
125:8 128:20
134:13 135:19
136:4,12 138:6
139:18 146:1
163:12,15 182:14
192:17 201:8
208:14 209:8
210:3
yesterday 150:8
yogurt 195:24
york 2:15,19 6:6
18:25 20:1 21:3
54:21 81:24 82:3
104:23 105:2
177:24 179:22,23
180:3,14 181:10
young 104:19
z
z 68:1
zero 212:10
zone 78:20 79:16
81:14 152:12
165:8 172:13
215:20
zucchini 196:5

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

Veritext Legal Solutions is committed to maintaining the confidentiality of client and witness information, in accordance with the regulations promulgated under the Health Insurance Portability and Accountability Act (HIPAA), as amended with respect to protected health information and the Gramm-Leach-Bliley Act, as amended, with respect to Personally Identifiable Information (PII). Physical transcripts and exhibits are managed under strict facility and personnel access controls. Electronic files of documents are stored in encrypted form and are transmitted in an encrypted fashion to authenticated parties who are permitted to access the material. Our data is hosted in a Tier 4 SSAE 16 certified facility.

Veritext Legal Solutions complies with all federal and State regulations with respect to the provision of court reporting services, and maintains its neutrality and independence regardless of relationship or the financial outcome of any litigation. Veritext requires adherence to the foregoing professional and ethical standards from all of its subcontractors in their independent contractor agreements.

Inquiries about Veritext Legal Solutions' confidentiality and security policies and practices should be directed to Veritext's Client Services Associates indicated on the cover of this document or at www.veritext.com.